

LIFESTYLE COMMUNITIES

vs.

CITY OF WORTHINGTON

Deposition of

Matthew Greeson

October 06, 2023



614.460.5000 | www.priohio.com | pri@priohio.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

LIFESTYLE COMMUNITIES,)	
LTD., ET AL.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:22-cv-1775
CITY OF WORTHINGTON,)	
OHIO,)	
)	
Defendant.)	

DEPOSITION
of MATTHEW GREESON

Taken at Worthington City Hall
6550 North High Street
Worthington, Ohio 43085
on October 6, 2023, at 9:00 a.m.

Reported by: Rhonda Lawrence

--0--

1 APPEARANCES:

2

3 Christopher L. Ingram
4 VORYS SATER SEYMOUR AND PEASE LLP
5 52 East Gay Street
6 Columbus, Ohio 43215
7 614.464.5480
8 clingram@vorys.com

9 on behalf of the Plaintiffs.

10

11 Paul J. Schumacher
12 DICKIE MCCAMEY
13 600 Superior Avenue East, Suite 2330
14 Cleveland, Ohio 44114
15 216.390.1795
16 pschumacher@dmclaw.com

17 and

18 Richard J. Silk, Jr.
19 DICKIE MCCAMEY
20 10 West Broad Street, Suite 1950
21 Columbus, Ohio 43215
22 614.258.6000
23 rsilk@dmclaw.com

24 on behalf of the Defendant.

--0--

STIPULATIONS

It is stipulated by and among counsel
for the respective parties that the deposition
of MATTHEW GREESON, the witness herein, called
by the Plaintiffs under the applicable Rules of
Federal Civil Court Procedure, may be taken at
this time by the stenographic court reporter and
notary public pursuant to notice; that said
deposition may be reduced to writing
stenographically by the court reporter, whose
notes thereafter may be transcribed outside the
presence of the witness; and that the proof of
the official character and qualification of the
notary is waived.

--0--

1	INDEX OF EXAMINATION		
2			PAGE
3	BY MR. INGRAM:		6
4			
5			
6	INDEX OF EXHIBITS		
7	EXHIBIT	DESCRIPTION	PAGE
8	1	Land Use Plan	65
9	6	Ordinance No. 04-2022	234
10	7	Resolution No. 04-2022	243
11	14	Memorandum to Greeson from Bitar, 1-11-12	30
12	15	Memo to Council from Greeson, 2-21-12	39
13			
14	16	Engagement of Special Counsel	48
15	17	Letter to Greeson from MSK	51
16		Re: Proposal for Planning and Urban Design Services	
17	18	City of Worthington Launching Visioning UMCH Process press release	54
18			
19	19	Memo to Greeson from Brown, 9-27-13	55
20			
21	20	Memo to Greeson from Hurley, 8-5-14	60
22	21	UMCH Focus Area Checklist	68
23	22	Email chain	71
24	23	Email chain	75

1	INDEX OF EXHIBITS (continued)		
2	EXHIBIT	DESCRIPTION	PAGE
3	24	Email from Brown to Greeson, 1-18-18	88
4	25	Email chain	90
5	26	Email from Greeson, 4-19-16	96
6	27	Memo from Management Partners to Greeson/Stewart, 4-2-18	100
7			
8	28	Email from Greeson to Kowalczyk, 2-28-18	134
9	29	Email chain	141
10	30	Email from Greeson to Jenkins, 3-9-20	145
11			
12	31	Florey Todd Summary of Phases for Development of the UMHC Property	166
13			
14	32	Memo to City Council from Greeson, 1-22-19	169
15	33	Email chain	180
16	34	Email chain	185
17	35	Email chain	190
18	36	Email chain	195
19	37	Email chain	200
20	38	Staff Memorandum from Brown to Greeson, 11-8-21	209
21			
22			
23			
24			

1 MATTHEW GREESON

2 being first duly sworn, as hereinafter
3 certified, deposes and says as follows:

4 CROSS-EXAMINATION

5 BY MR. INGRAM:

6 Q. Good morning. Please state your name
7 for the record.

8 A. My name is Matthew Henry Greeson.

9 Q. Good morning, Mr. Greeson. We just met.
10 As I mentioned, my name is Chris Ingram. I'm an
11 attorney for the plaintiffs in this case,
12 Lifestyle Communities. And so during the course
13 of your deposition today, I'll refer to our
14 client as Lifestyle or LC, I think is what it's
15 often referred to in some of the documents that
16 have been produced. If I mention Lifestyle or
17 LC, you understand that that's who I'm referring
18 to?

19 A. Yes.

20 Q. Is that okay?

21 A. Yes.

22 Q. Have you ever been deposed before,
23 Mr. Greeson?

24 A. No.

1 Q. So this is your first deposition?

2 A. Yes.

3 Q. Well, let's walk through some ground
4 rules, then, for your deposition today. So
5 first, I just want you to make sure that if I
6 ask you a question and you don't understand or
7 are confused about any aspect of my question,
8 please stop me, let me know. Okay?

9 A. Sure.

10 Q. And if you don't ask me to repeat or
11 rephrase a question, we are all going to assume
12 that you understood my question. Fair?

13 A. That's fair.

14 Q. And it's important that -- we have a
15 court reporter here with us this morning that is
16 creating a transcript of your deposition, and so
17 it's important that we don't talk over one
18 another. And so if you would let me finish
19 asking my question before you begin your answer,
20 and I will likewise try to have you -- permit
21 you to finish your answer before I start my
22 question. Okay?

23 A. I assume we'll both do our best.

24 Q. Fair enough.

1 And with that written transcript, our
2 court reporter today cannot transcribe body
3 language or shaking of the head. So we'll need
4 you to provide verbal responses. So please do
5 answer my questions and refrain from uh-huhs or
6 huh-uhs as opposed to saying yes or no. Does
7 that make sense?

8 A. Yes.

9 Q. Excellent. And you're doing great so
10 far.

11 If you need to take a break at any time,
12 just let me know, and we'll see what we can do
13 about when it's best to take a break, and I will
14 definitely need you to finish giving an answer
15 while there's any question pending.

16 MR. SCHUMACHER: We're going to take a
17 break when we need to after questions are done.

18 Q. Do you understand, Mr. Greeson?

19 A. I understand him, and I'm -- I'll let
20 you know when I need a break.

21 Q. Okay. Now, it's important that we get
22 your full, complete and accurate answers today.
23 So I have to ask you, have you taken any
24 medication or drugs or anything that would make

1 it difficult for you to understand and answer my
2 questions today?

3 A. No.

4 Q. So is there any reason at all why you
5 cannot give your full, complete and accurate
6 testimony today?

7 A. No, other than it's -- other than there
8 may be things I don't recall because I've been
9 away from Worthington for a while.

10 Q. Sure. But other than -- what I'm really
11 getting at is, is there anything affecting your
12 mental capacity --

13 A. No.

14 Q. -- or your ability to think clearly
15 today?

16 A. No.

17 Q. Thank you.

18 Now, earlier you just swore an oath to
19 tell the truth in today's deposition. Do you
20 understand that's the same oath that you would
21 be asked when testifying in court in this
22 matter?

23 A. Yes.

24 Q. Now, I want to talk about,

1 Mr. Greeson -- you mentioned before we went on
2 the record that you had been here at the city
3 for 15 years and you were the city manager,
4 correct?

5 A. Yes, I was the city manager beginning in
6 December of 2007.

7 Q. Okay. And when did you leave the city?

8 A. December of 2022.

9 Q. Were you the city manager the entire
10 time from 2007 to 2022?

11 A. Yes. I was the city manager and
12 director of public safety. I think it's titled
13 director of safety.

14 Q. Great.

15 And you're here with Mr. Schumacher and
16 Mr. Silk. Are they your attorneys today?

17 A. They're the City of Worthington's
18 attorneys.

19 Q. Are they your attorneys?

20 A. I believe that -- they're not my
21 personal attorneys, no.

22 Q. Okay. And Mr. Greeson, what did you do
23 to prepare for your deposition today?

24 A. I read some documents and I met with the

1 City's attorneys.

2 Q. Did you talk to anyone other than the
3 City's attorneys?

4 A. About the substance of the matter, no.
5 There are some people I made aware that I was
6 being deposed today.

7 Q. As far as preparing for today's
8 deposition?

9 A. No. The City's attorneys and I read a
10 number of documents.

11 Q. Okay. Do you recall about how many
12 documents you reviewed?

13 A. I don't remember the exact number, but I
14 can tell you what they were.

15 Q. Okay. What were they?

16 A. I read minutes from meetings. I read
17 the complaint again. And I read the staff
18 report for the meetings in question.

19 Q. Okay. Can you -- were there any other
20 documents that you reviewed?

21 A. Not that I recall.

22 Q. And you reviewed meeting minutes plural.
23 Do you recall which meetings?

24 A. I read the minutes for the last MPC

1 meeting and the City Council meeting.

2 Q. And which City Council meeting minutes
3 did you review?

4 A. The one in which the zoning case was
5 considered.

6 Q. So would that have been the December
7 2021 meeting?

8 A. I don't recall the specific date.

9 Q. All right. And you referenced the last
10 MPC meeting. Was that in connection with the
11 rezoning and the --

12 A. In which the denial recommendation was
13 proffered to the City Council.

14 Q. Any other meeting minutes besides those?

15 A. No.

16 Q. You said you read the complaint again.
17 Any other -- any other documents from this case,
18 to the extent you knew?

19 A. Not in the -- not recently. I had read
20 the last -- the Court's last decision when it
21 came out.

22 Q. Okay. The order on reconsideration?

23 A. Uh-huh. Yes. But not recently.

24 Q. Good catch.

1 what did you do, Mr. Greeson, before you
2 were the city manager of Worthington?

3 A. I held a variety of positions for the
4 County of Volusia in Florida.

5 Q. Any of those positions pertain to zoning
6 or land use in Volusia County?

7 A. I did not directly oversee the planning
8 department except for a short period of time
9 when I was the acting county manager; however, I
10 held a number of positions that interacted with
11 either the county's land or required a lot of
12 coordination and work with the growth and
13 resource management department of that county.

14 Q. Okay. And my geography is off. Volusia
15 County, help orient me?

16 A. It's the Daytona Beach area.

17 Q. And so you're the acting county manager
18 in Volusia County?

19 A. I held five positions in about 12 years
20 from an entry-level position and then I left as
21 the deputy county manager, so there was a period
22 I was acting county manager.

23 Q. And during those 12 years, those were
24 all public positions?

1 A. Yes.

2 Q. And what did you do before Volusia
3 County?

4 A. I worked for a small local government
5 consulting firm for a little over a year right
6 out of college.

7 Q. And what was the firm?

8 A. It was Arrington Florida Partnerships.

9 Q. And what did they do?

10 A. They did various management consulting
11 projects for cities and counties around Florida.

12 Q. What type of consulting projects?

13 A. Could include strategic planning, it
14 might include budget analysis, corporation
15 studies, you know, anything that -- board
16 retreats, helping to work on behalf of city
17 managers and city councils and county managers,
18 county commissions.

19 Q. So something like creating a
20 comprehensive plan for the city's future
21 development?

22 A. No, they did not -- that consulting firm
23 didn't work on planning and land use. If they
24 were involved in that, they would have involved

1 another consultant that had expertise on that.

2 It was more a general management consulting
3 firm.

4 Q. Mr. Greeson, did you -- what college
5 degrees have you obtained?

6 A. I have a bachelor's of arts with a major
7 in political science and a master's in public
8 administration.

9 Q. Any other graduate degrees?

10 A. No.

11 Q. Do you have any professional
12 certifications?

13 A. Yes. I'm an International City County
14 Management Association credential manager.

15 Q. Okay. Any other certifications?

16 A. No.

17 Q. So generally speaking, in your 15 years
18 as the city manager at Worthington, what were
19 your responsibilities as city manager?

20 A. I oversee the day-to-day operations of
21 the city.

22 Q. Okay. Were you responsible to assist
23 City Council in leading and managing economic
24 development opportunities in the city?

1 A. Yes. In the sense that I oversaw the
2 staff, made budget recommendations and in some
3 cases policy recommendations related to those
4 matters.

5 Q. When you say oversaw the staff, what do
6 you mean by that?

7 A. All of the staff under the city charter
8 technically reports to the city manager or is
9 hired by and appointed by the city manager.

10 Q. And you indicated that you made policy
11 recommendations with respect to economic
12 development opportunities. What type of policy
13 recommendations were you responsible for making?

14 A. I think wide ranging, and so not in
15 every instance does the city manager make policy
16 recommendations, but one of the manager's key
17 responsibilities under the city charter is to
18 recommend the city budget, and one of the
19 council's key duties is to, you know, adopt the
20 budget. And so probably, first and foremost, it
21 was recommending how much money we might
22 allocate in the budget for anything that had to
23 do with economic development and what programs
24 the city might offer to advance the economic

1 vitality of the city, and that could range.

2 There's a wide range of those.

3 Q. And as city manager, what were your
4 responsibilities with respect to rezonings in
5 the city?

6 A. The planning and -- planning department
7 ultimately reported to me at different times.
8 They either reported to me or to Ms. Stewart,
9 the assistant city manager. And so in that way
10 I was somewhat responsible for overseeing their
11 work. Mr. Brown, who is the director of that
12 department, oversaw -- currently oversees and
13 oversaw, during a good part of my tenure, that
14 function, and then he reported to me for many
15 years, and then later reported to Ms. Stewart.

16 Q. Okay. So with respect to rezonings in
17 the city, was Mr. Brown -- Lee Brown primarily
18 responsible for overseeing rezonings?

19 MR. SCHUMACHER: Objection to the term
20 rezonings.

21 A. Ultimately, it's the planning
22 commission's responsibility under the charter to
23 do that, so if you read the charter, the
24 planning commission authority is pretty

1 significant in that regard in terms of making
2 recommendations. And so I would describe the
3 role of the planning department as, you know,
4 accepting applications, coordinating review,
5 preparing the packets, interacting with
6 applicants and members of the public who may
7 have questions, and helping administer the code
8 and the process, preparing it ultimately for the
9 planning commission's recommendations to the
10 City Council, in the case of rezonings.

11 Q. Sure. And then you said planning
12 commission, I think you said has ultimate
13 responsibility or has primary responsibility? I
14 don't know. I want to make sure I understand
15 what you said. My real question is: where does
16 City Council fall into that?

17 A. Well, they're the ultimate -- they make
18 the decision after having heard the planning
19 commission's recommendations, but the planning
20 commission plays a critical control, and they
21 have duties in the charter that are outlined
22 around, you know, long-range planning and those
23 responsibilities.

24 Q. And so Mr. Brown, then, in the planning

1 department, is responsible for the process, I
2 think you said, and facilitating the planning
3 commission's and then ultimately City Council's
4 review; is that fair?

5 MR. SCHUMACHER: Objection.

6 A. Could you repeat -- I'm sorry. Could
7 you repeat that again?

8 (Record read as requested.)

9 MR. SCHUMACHER: Do you understand the
10 question?

11 A. Yeah. I'm stuck on the word
12 facilitating. So let me just better describe
13 what they do. You know, they answer questions.

14 MR. SCHUMACHER: Are you talking about
15 the planning commission?

16 A. The staff. Staff's role. What's the
17 staff's role, in this case Mr. Brown and his
18 staff. And you're specifically talking about
19 rezonings, right?

20 Q. Correct.

21 A. You're not -- because they oversee
22 building inspections and plan reviews and Ohio
23 Building Code administration, lots of other
24 things. The breadth of that department is more

1 than just rezonings. Ultimately, I think
2 they're responsible for taking in the
3 application, administering whatever applies, the
4 code, you know, the fee, administering what the
5 code calls for, asking for the materials that
6 are required by the code, reviewing that and
7 providing information to the planning commission
8 about the application, and helping assist the
9 planning commission and ultimately the City
10 Council in their review of it.

11 And I think, if you look at the
12 memorandum that Mr. Brown did for the case
13 involved here, he was fulfilling his obligation
14 by providing information that was necessary for
15 them to make an informed decision. But I want
16 to be clear, facilitating doesn't always mean --
17 it doesn't mean deciding.

18 Q. Gotcha. That makes sense. Thank you.

19 And so I take it, then, that Mr. Brown
20 and the planning department, they're meeting
21 with applicants and talking about rezoning
22 applications and the materials during the course
23 of preparing everything for both planning
24 commission and council's review; is that how it

1 works?

2 MR. SCHUMACHER: Are we back to talking
3 generally now, or this specific case?

4 Q. Do you understand my question,
5 Mr. Greeson?

6 A. I do.

7 Q. You may answer.

8 A. I think it depends. Certainly, the
9 staff is always -- let me be clear. Yes, we
10 make the staff available to answer questions
11 to -- whether that be the public, certainly
12 provide the technical information that often the
13 city holds or sometimes the city holds. I think
14 we meet with applicants, meet with residents
15 that might be concerned about the process and we
16 explain how the process might work. And
17 generally outline the process. Those take
18 different forms in different cases, I think.

19 Q. And as far as the overall --

20 A. Generally, yes.

21 Q. Sure. And with respect to the overall
22 process, were there any written policies or
23 procedures that staff is abiding by or that
24 guide staff's actions with respect to rezonings?

1 A. The codified ordinances are the law
2 related to it, and so that's -- the charter and
3 the codified ordinances are, you know, one and
4 two. There are other guiding documents that
5 inform the dialogue, but aren't necessarily
6 codified law. So that would include the comp
7 plan, which is the subject of this discussion,
8 that would include the bike/ped plan, bike and
9 pedestrian plan. That would include other
10 documents, other plans that the city might have
11 in place.

12 Q. Okay. And thank you. My question is a
13 little bit different. So let's just
14 hypothetically assume I'm a new employee in
15 Mr. Brown's department and I come to either
16 Mr. Brown or to the city manager and I ask,
17 okay, hey, I got this rezoning application, what
18 is my role as a staff member of the planning
19 department? Do I need to meet with these
20 people? What do I need to get from there? Is
21 there some, you know, guiding document beyond
22 the legal documents that you referenced?

23 A. I don't recall that there is. I'm not
24 aware of one.

1 Q. No policy or written procedure? That's
2 really what I'm asking.

3 A. I don't think there is a written
4 procedure that says for every single zoning
5 application this is exactly how you treat it,
6 nor do I think there's an obligation legally or
7 by policy that we do all these things. I think
8 our obligation is to support the planning
9 commission and the council's decision-making
10 process and give them the information that they
11 need. But there's nothing that says we have to
12 meet with an applicant or we have to answer a
13 citizen's phone call about the process.

14 Q. And I was only asking you whether it
15 existed, not whether it was right or wrong.

16 A. Sure.

17 MR. SCHUMACHER: So are you going to
18 hire him, or not?

19 THE WITNESS: As a planner? We'll see
20 by the end of the day.

21 MR. SCHUMACHER: Okay.

22 BY MR. INGRAM:

23 Q. My prior line of questioning pertains
24 generally to rezonings. How about for

1 development plan applications? And really, I'm
2 asking about development plans for, you know,
3 large mixed-use developments, such as the one
4 across the street from where we are today.

5 A. I think, under Worthington's code,
6 there's development plans and then there's PUDs.
7 Are you asking about planned unit developments?

8 Q. Correct. PUDs.

9 A. Okay. Which is a rezoning. So I'm not
10 sure I have a different answer.

11 Q. Perfect. So same answers. Got it.

12 MR. SCHUMACHER: Obviously, we're
13 referring to this property? It just seems that
14 the question and answer assumed something that
15 you didn't ask about, but it's your deposition.

16 A. I'm not -- what's your question?

17 Q. I actually didn't have a question.

18 MR. SCHUMACHER: I don't think there is
19 a question anymore.

20 MR. INGRAM: Mr. Schumacher was
21 intervening. We'll move on.

22 A. Yeah, I'm not --

23 MR. SCHUMACHER: He calls it soliloquy.

24 MR. SILK: Soliloquy.

1 MR. SCHUMACHER: Soliloquy. Thank you.

2 BY MR. INGRAM:

3 Q. Now, while you were the city manager
4 here in Worthington, Mr. Greeson, who did you
5 answer to?

6 A. The City Council, the seven-member City
7 Council.

8 Q. Why did you leave the City of
9 Worthington city manager position to accept the
10 same role at the City of Kettering?

11 MR. SCHUMACHER: Objection. Relevance.
12 You can answer.

13 A. It was a career opportunity for me to
14 move to a very reputable, larger community in
15 Ohio, and one that I held in high regard, and
16 its city manager was retiring after a long
17 period of time. I held him in high regard. I
18 held that city in high regard. And it posed
19 some new challenges for me as well as an
20 opportunity to kind of run a bigger city, bigger
21 budget, different challenges.

22 Q. The City of Kettering is enjoying
23 economic growth and development right now; isn't
24 that right?

1 MR. SCHUMACHER: Objection. Relevance.

2 A. It's got both economic opportunity and
3 also has some challenges.

4 Q. My grandmother was a kindergartener
5 teacher for like four decades in Kettering.

6 A. That's great. It's a wonderful
7 community. I'm proud to be there.

8 Q. All right. For purposes of our
9 discussion today, Mr. Greeson, when I refer to
10 the UMCH property, or Lifestyle's property, or
11 frankly, the property, I'm going to be talking
12 about the property across the street that we're
13 pointing to, 1033 High Street, which is the
14 approximately 37.6 acres that are the center of
15 this dispute. Do you understand what I'm
16 referring to?

17 A. Yes.

18 Q. And if you say the UMCH property or LC's
19 property, we're both going to assume that we're
20 talking about the property that we're looking at
21 right now, fair?

22 A. Yes.

23 Q. Okay. When did the UMCH property come
24 onto the City's radar as a potential opportunity

1 for development?

2 A. I think discussions about the future of
3 UMCH had been going on for, you know, quite some
4 time in the community, and I can't offer a
5 specific date, because I don't recall one. But
6 I do know that the -- that potential development
7 predates my -- discussions predate my tenure
8 with the city. Particularly, you know, there
9 was a lot of discussion with the rezoning with
10 the front acreage to what it is today and the
11 development of the -- whatever it's called, the
12 Bickford assisted living facility. And so at
13 points in time, as UMCH sought to either lease
14 or sell or develop pieces of their land, it was
15 front of mind for the community, and it was a
16 subject of discussion, and I'm aware of that,
17 but I wasn't here for it.

18 Q. Okay. So when you first came to be
19 the -- did you move from the Daytona Beach area
20 to Worthington?

21 A. I moved from DeLand, Florida to
22 Worthington, yes.

23 Q. In 2007?

24 A. In December of 2007.

1 Q. Very stark memory. Was it cold?

2 A. It was snowing.

3 Q. Welcome.

4 So when you moved to Worthington in
5 December of 2007 and became the city manager,
6 when did you first take notice of or learn about
7 the development opportunities of the UMCH
8 property?

9 A. I'm not sure the exact date or time or
10 month, but I had read the 2005 comprehensive
11 plan which outlined the UMCH property as a focus
12 area, and became more -- became aware of UMCH
13 and their operations in December of 2007 because
14 I believe I attended a holiday event for the
15 UMCH staff.

16 Q. Okay.

17 A. So I'm not -- we weren't talking about
18 development. I was learning about the
19 operations of the facility from the director who
20 had invited me to that event, but I had read the
21 comprehensive plan.

22 Q. Did you read the -- I guess, why did you
23 start with or read the 2005 comprehensive plan?

24 A. I believe I read it as an applicant to

1 familiarize myself with the community when I was
2 seeking the city manager position, and then, you
3 know, at some point read it again as a new city
4 manager. I did the same as I moved to
5 Kettering.

6 Q. And why were you reviewing -- both in
7 the Worthington example and in the City of
8 Kettering example, why did you decide to select
9 the comprehensive plan as something to review?

10 A. I don't think I singled it out. I read
11 every -- if you knew me better, you would know I
12 read every planning document, the budget that
13 was available to me online or, you know, readily
14 available otherwise. And because it's an
15 important policy document in the life of the
16 city.

17 Q. What you just referred to, you're
18 referring to the comprehensive plans?

19 A. Yes, and the budget and the bike/ped
20 plan and the -- you know, anything that
21 council's adopted to help, you know, guide
22 decision-making.

23 Q. Mr. Greeson, how long has the UMCH
24 property sat vacant as green space, from your

1 recollection?

2 A. I don't have a specific recollection of
3 that. I can't cite the month or year at this
4 point. And it depends on what you believe is
5 green space. There is a time period in which
6 they ceased operations, and then there was a
7 time in which -- where they demolished the
8 vacant buildings that formerly housed the social
9 service mission. And so you define green space,
10 and there's a permit for the demolition that
11 could probably mark the date, and there's a time
12 in which they announced the ending of
13 operations. Those might inform your question.

14 Q. Do you know which years UMCH ceased
15 operations on that site?

16 A. To tell you the truth, I can't remember
17 the specific year at this point.

18 Q. Was it before you moved to Worthington?

19 A. They ceased operations after I -- while
20 I was city manager.

21 Q. Okay. Fair enough.

22 --0--

23 (Deposition Exhibit 14 marked.)

24 --0--

1 MR. SCHUMACHER: Are we at 14?

2 MR. INGRAM: 14.

3 BY MR. INGRAM:

4 Q. Mr. Greeson, I've handed you what we've
5 marked as Exhibit 14.

6 A. Okay.

7 Q. And for the record, Exhibit 14 is a
8 memorandum Bates numbered Worthington 36387.

9 Mr. Greeson, Exhibit 14 is a memorandum
10 to you from Lynda Bitar, B-I-T-A-R, dated
11 January 11, 2012. Do you see that?

12 A. I do.

13 Q. Earlier you said you're very meticulous
14 about reading everything. I take it you would
15 have reviewed and were familiar with this
16 memorandum?

17 MR. SCHUMACHER: Can you give him a
18 chance to read it?

19 A. Yeah, I don't specifically recall this,
20 given it was 2012 and it's currently 2023. But
21 I'll be glad to read it --

22 Q. Sure.

23 A. -- if you give me the time.

24 Q. Of course.

1 A. Okay. I've completed my reading of it.
2 what's your question?

3 Q. Okay. First of all, who is Ms. Bitar?

4 A. It's Bitar. She is -- her title may
5 have changed, but development coordinator in the
6 planning and building department. I can't
7 remember in 2012 whether she was housed in City
8 Hall under the city manager's office, but there
9 was a point in time in which that was the case.

10 Q. Would she have reported to you at this
11 time?

12 A. She may have, or to the assistant city
13 manager, later, and currently, she reports to
14 Mr. Brown.

15 Q. So she starts her memorandum to you
16 with, as you know. Do you see that?

17 A. Yes.

18 Q. And she talks about the UMCH property
19 being currently for sale. Do you recall -- does
20 this refresh your recollection about the time of
21 when the UMCH property was vacant and they were
22 trying to sell the property?

23 A. Yeah. They ceased operations or they
24 announced they were going to cease operations,

1 and I don't remember whether they, you know,
2 articulated a desire to sell it before they
3 ceased operations or how that worked. My memory
4 doesn't -- I don't retain -- didn't retain that.
5 But yes, we became aware that they were ceasing
6 operations and that they anticipated, over some
7 period of time, to no longer use it for UMCH's
8 social service mission and do some kind of
9 transaction, potentially a sale, that would lead
10 to development.

11 Q. Ms. Bitar wrote to you here at the end
12 of the first paragraph, she says that, because
13 worthington is a fully developed community with
14 few opportunities for redevelopment which will
15 increase the tax base, it is critical that
16 redevelopment of the site is guided to benefit
17 the community in the future.

18 This last bit here, that sentence, it is
19 critical that redevelopment of the site is
20 guided to benefit the community in the future,
21 what did you understand that to mean?

22 A. I don't recall the memo personally, so I
23 would only be subjectively answering the
24 question now. But I think she outlines that

1 there's a balance of -- that could mean
2 economic, that could mean, you know,
3 opportunities for green space, and that could
4 mean opportunities for living. Some balanced
5 combination of all of those potentially, as well
6 as development that supported the city's budget
7 and didn't zap its ability to continue to
8 provide high-quality services.

9 Q. Okay. She goes on to say in the next
10 sentence, in order to evaluate current market
11 reality and long-term viability for
12 redevelopment of the site, contracting with a
13 consultant is recommended.

14 what type of consultant would be
15 utilized to guide this redevelopment?

16 A. Well, since we at that time had one
17 planner on staff, and now only have, I believe,
18 two -- "we" being the City of Worthington, which
19 I'm no longer a part of -- I believe she meant a
20 planning consultant that assisted in the wide
21 range of skill set to help do the things she's
22 outlined in the memo.

23 Q. Okay. And certainly, you can recall
24 MKSK being retained to update the city's 2005

1 comprehensive plan. I believe their work
2 started a year after this.

3 A. Yes.

4 Q. Is this recommendation -- was this kind
5 of the genesis of that effort with MKSK?

6 MR. SCHUMACHER: You mean this memo?

7 MR. INGRAM: Correct.

8 A. I don't think the sole memo was the
9 genesis of it. The genesis of it was a very
10 important context sensitive piece of property in
11 our community that had been the source of a lot
12 of dialogue about its future in the 2005
13 comprehensive plan, if the -- you know, where
14 they were looking at if UMCH never ceased to
15 exist as a social service purpose on that
16 property and changed their mission, what might
17 it become. Even prior to that, their discussion
18 about, you know, as they sold off pieces of the
19 property or contemplated pieces of the property,
20 it was important. The operations had been
21 controversial, and periodically throughout
22 UMCH's operational history they had had conflict
23 with the community, and being a built-out
24 community, this property, whatever you want to

1 call it, UMCH, Lifestyle, LC, the property, 1033
2 High Street, was viewed, probably still is
3 viewed, as one of the most sensitive sites in
4 the community, high profile, a lot of community
5 concern about its future, posed an opportunity
6 for Worthington. I think she in this memo is
7 stating the obvious that we needed to do some
8 planning, given the fact that it's an important
9 property in the community and it appeared to be
10 in transition.

11 Q. Did you ask her to prepare this
12 memorandum, or is this something she did on her
13 own?

14 A. I don't remember.

15 Q. You mentioned there were -- the UMCH's
16 prior use was controversial or there was some
17 issue with it. Can you elaborate on what you're
18 referring to?

19 A. Yeah, I don't think -- well, not
20 extensively at this point, because the details
21 of it have faded. But over the course of time
22 at different intervals in the life of UMCH's
23 operation of a children's home on its property,
24 you know, there had been operational issues that

1 led the community to have various levels of
2 outcry. And so prior to their decision to cease
3 to operate, there had been a period of time in
4 which they had management challenges. I think
5 they had, you know, a number of different
6 directors and turnover in the director's roles.
7 But that really wasn't the community issue.

8 The community's issue was that they had
9 had some kids that left the campus and committed
10 some crimes. There was a higher volume of
11 police interaction or calls to the site to
12 respond to issues that, you know, were arising.
13 And the neighborhood and the community got
14 frustrated with that and voiced their opinion in
15 various ways.

16 You know, I recall at some point one of
17 the county social service agencies pulled
18 funding from them, and so all of those things
19 were, I think, contributing factors to their
20 decision to not get out of the social service
21 business, because they're certainly a viable,
22 valuable continuing entity in the Columbus
23 region, but to no longer be in the housing
24 business and use this site to house children.

1 Q. Okay. And with respect to those issues
2 you just referred to and the public outcry, do
3 you know about what year range period you're
4 referring to?

5 A. Well, it predates this memo, so I would
6 have to go back in time and --

7 Q. Were you the city manager then?

8 A. I was the city manager during the period
9 in which there was outcry prior to this memo
10 being written in 2012 and their decision to
11 start marketing the property. However, I think,
12 if you read newspaper articles or researched
13 city files, you might find that that happened
14 episodically, you know, that there were a number
15 of times over history where issues on the
16 property became a concern to the community, and
17 there was some similar level of outcry. And so
18 it wasn't the only time over history; it was
19 just one of the times.

20 Q. Okay.

21 A. From my understanding.

22 Q. In Exhibit 14, Ms. Bitar makes reference
23 to the Community Improvement Corporation. Do
24 you see that? It's in the second paragraph.

1 A. Yes.

2 Q. And she raises the Community Improvement
3 Corporation, or the CIC, along with the planning
4 commission and the City Council. What would the
5 CIC's role be with respect to guiding the future
6 development of the property?

7 A. I'm not sure in this instance. Well,
8 I'm not sure in 2012 what she was contemplating,
9 other than that we would have, you know, engaged
10 those members in the process so that their, you
11 know, involvement with the city was honored and
12 that we listened to them about their thoughts,
13 but they didn't have an active role in -- they
14 don't have an active role in comp planning by
15 law. That's the planning commission's role.

16 Q. Okay.

17 A. I just don't specifically remember why
18 Ms. Bitar would have included that.

19 --0--

20 (Deposition Exhibit 15 marked.)

21 --0--

22 BY MR. INGRAM:

23 Q. Mr. Greeson, I've handed you what's been
24 marked as Exhibit 15, which is Bates numbered

1 Worthington 28381 through 28382. And Exhibit 15
2 is a memorandum from you to the Worthington City
3 Council, dated February 21st, 2012; is that
4 correct?

5 A. Looks like this is a draft memorandum.
6 It's not on letterhead, nor is -- there are some
7 missing blanks, and I would not have sent this
8 in that form to City Council. So this appears
9 to me to be a draft.

10 Q. Okay. Fair enough. So draft memorandum
11 that you were -- you had prepared?

12 A. Looks like it.

13 Do you want me to read it?

14 Q. If you want to review it, go ahead.

15 A. I would like to.

16 Q. Have you had an opportunity to review
17 the full exhibit?

18 A. I have.

19 Q. Okay. In the background in this draft
20 memorandum it says, as you know, I was
21 approached by Continental. Do you see that?

22 A. Yes.

23 Q. And is that Mr. Frank Kass?

24 A. Yes.

1 Q. Were you approached by Mr. Kass?

2 A. Yes. It actually jogs my memory as
3 being one of the other things that contributed
4 to, you know, probably the need to do the
5 comprehensive plan update that was adopted --
6 whenever we readopted it, 2014.

7 Q. Okay. And Mr. Kass approached you
8 because Continental was seeking to construct a
9 Giant Eagle grocery store with other retail and
10 gas -- a gas station on the UMCH property,
11 correct?

12 A. Yes. I think that's outlined.

13 Q. And --

14 A. Although he never -- nobody ever made
15 formal application to that effect, so it was
16 conceptual.

17 Q. You anticipated my next question. So no
18 formal application had been filed as of February
19 2012, but it looks like, based on your writing
20 here, that city officials met to discuss this
21 concept proposed by Continental --

22 MR. SCHUMACHER: Objection.

23 Q. -- is that fair?

24 MR. SCHUMACHER: Objection. Compound

1 question. Which question do you want him to
2 answer?

3 Q. Do you understand my question?

4 MR. SCHUMACHER: Do you want to have her
5 read it back?

6 THE WITNESS: Yeah, I would benefit from
7 having it read back at this point. Both of you
8 were talking.

9 MR. INGRAM: Counsel, if you could
10 refrain from talking over me, I'd appreciate it.

11 MR. SCHUMACHER: I'm sorry. I wanted to
12 make my objection because the question was
13 clearly compound.

14 MR. INGRAM: You can do so after I
15 finish asking my question.

16 MR. SCHUMACHER: But I need to do that
17 before he answers, because if he answers a
18 compound question, a yes or no could be to
19 either of those questions, and my job is to make
20 sure the record's clear. And I will continue to
21 do that. But I will try not to speak over you.

22 And I'll ask you to wait until the
23 question is completed before you answer.

24 THE WITNESS: Yes, sir.

1 MR. SCHUMACHER: Thank you.

2 (Record read as requested.)

3 MR. SCHUMACHER: Same objection.

4 A. I believe this -- what looks like a
5 draft memo is accurate in that we met with --
6 yes, we met with representatives of Continental
7 in the times outlined.

8 BY MR. INGRAM:

9 Q. Okay. And based on those meetings, it
10 says that the proposal, particularly the large
11 format retail use, was inconsistent with the
12 2005 comprehensive plan update. Do you see
13 that?

14 A. Yes.

15 Q. And did not garner support from the city
16 officials, correct?

17 A. I don't recall the specific discussions
18 of the group, but no, it did not garner my
19 support. And I believe what's written here is
20 accurate.

21 Q. And why didn't you support it?

22 MR. SCHUMACHER: Objection. Relevance.

23 A. I don't think -- for a variety of
24 reasons. It did not reflect the -- what we

1 thought the community wanted and needed. It
2 certainly didn't meet the objectives of the
3 comprehensive plan. It was wholly inconsistent
4 with that. But it also didn't address many of
5 the things we knew that the community thought
6 was important: More office use, which is, you
7 know, 75 percent of the city's budget. Well, I
8 don't know the current budget. But over 70
9 percent of the budget is derived from income
10 taxes. And so jobs and workers and income tax
11 revenue is critically important. You know, park
12 space preservation, good architecture, all those
13 things are critical. Defining characteristics
14 of Worthington.

15 You know, Worthington, you know, has
16 really worked hard to make itself a distinctive
17 community through good planning and good
18 stewardship and decision-making about
19 development over time and a lot of community
20 engagement around that. And I think the type of
21 development proposal they were offering
22 didn't -- wasn't in keeping with that, a large
23 format retail use. And it wasn't in keeping
24 with probably any site in Worthington. If you

1 look at the comprehensive plan, you know, large
2 format retail was something that, you know, we
3 weren't -- we weren't aiming for strategically.

4 And then it didn't strike the right
5 balance of -- of uses and approaches across the
6 property. Probably would have demanded more
7 services than revenue it created. All of those
8 would have been reasons that I would have
9 contemplated.

10 Q. Okay. You referenced architectural
11 elements and other matters that contribute to a
12 distinctly worthington, is the phrase you used,
13 development. And so my question to you is what
14 documents or what policies would one go to to
15 understand how they could design something that
16 is distinctly worthington?

17 A. Ultimately, I think the comp plan and
18 the architectural review guidelines -- I didn't
19 say distinctively worthington. I said
20 distinctive; meaning, high quality, compatible
21 with and -- and I think that's a little
22 different. But this is part of the
23 architectural review district, and it's also,
24 you know, again, reflecting that it's a context

1 sensitive site. It's embedded in a -- partially
2 embedded in a neighborhood, surrounded on
3 multiple sides by homes. It's across from the
4 City Hall, you know, which the city has worked
5 to make sure has character. It doesn't look
6 like a strip mall over here. It was designed to
7 look like the original Ohio Statehouse, so its
8 historic character was important.

9 And for all of those reasons, that site
10 is so sensitive and important, and you can --
11 you can imagine that a large format grocery
12 retail center is hard to make look and feel with
13 a large field of parking to fit into the context
14 sensitive setting that it's in.

15 Q. And I'm sorry if I misheard you, by the
16 way.

17 A. Yeah.

18 Q. Thank you for pointing that out.

19 I thought I heard you mention or refer
20 to two documents in response to my question,
21 which was the comprehensive plan, and you said
22 the architectural --

23 A. Review guidelines, which come later in
24 the process.

1 Q. Sure. And any other policies or
2 documents?

3 A. I don't recall at this time what adopted
4 plans we had. We later had a bike/ped plan and
5 some other documents that would have been
6 important. It would have been the codified
7 ordinances, the comprehensive plan at that time,
8 and the architectural review guidelines.

9 Q. Okay.

10 A. I also don't recall whether I sent this.
11 Not that it matters.

12 Q. Do you recall the circumstances of why
13 you would have prepared it?

14 A. Yeah. Well, I think they're outlined in
15 the memo. Whether I sent it or whether I used
16 it just to organize my own thinking, I don't
17 remember.

18 Q. You do conclude here we may need both
19 specialty planners and attorneys to assist us on
20 this matter as it moves forward.

21 Do you recall that?

22 A. I see that I wrote that. I wrote this,
23 it appears, after Ms. Bitar wrote her
24 memorandum, and so, obviously, we were thinking

1 about hiring planners to help assist with
2 updating the comprehensive plan. It was
3 probably a good idea, but I don't remember the
4 specific details of writing -- I don't remember
5 writing this memo, is what I'm saying.

6 Q. Okay. That's fair.

7 ==0==

8 (Deposition Exhibit 16 marked.)

9 ==0==

10 BY MR. INGRAM:

11 Q. I'm going to hand you what's been marked
12 as Exhibit 16. For purposes of the record,
13 Exhibit 16 is an engagement of special counsel,
14 Bates numbered Worthington 317901. Do you see
15 that, Mr. Greeson?

16 A. I do.

17 Q. Do you recall this document?

18 A. No.

19 Q. I'm going to let you review it.

20 A. Uh-huh.

21 Q. In the second paragraph --

22 MR. SCHUMACHER: Have you had a chance
23 to review it?

24 THE WITNESS: Not yet.

1 MR. INGRAM: I thought I heard you say
2 uh-huh.

3 MR. SCHUMACHER: I am the guardian of
4 the record.

5 A. Okay. I've read it.

6 BY MR. INGRAM:

7 Q. I just have a couple questions. Really,
8 drawing your attention to the third paragraph,
9 it says, the UMCH site was only recently vacated
10 as a place to care for troubled children.
11 Because that is so, it is the right time to
12 consider rezoning.

13 It goes on to say that the city had some
14 preliminary contact with a prospective developer
15 of the UMCH site who wants to develop a big box
16 for Giant Eagle. Do you see that?

17 A. Yes.

18 Q. Did the city ultimately retain a special
19 counsel in connection for the rezoning --

20 A. Yes.

21 Q. -- of the UMCH site?

22 A. Yes. This is helpful in -- oh, sorry.

23 Q. Go ahead.

24 A. Did you finish your question?

1 Q. Yes, I did.

2 A. Okay. Yes, and this is helpful in
3 jogging my memory. While we did not obtain
4 special counsel solely related to UMCH, although
5 UMCH obviously was and is one of the most -- I
6 don't want to use the term context sensitive,
7 because I don't necessarily have better words,
8 but a very important site in the life of this
9 community, probably only second to the Village
10 Green, but established by the founders in 1803.
11 But I think we believed that not only because of
12 the possibility of, you know, a mix of use of
13 development at UMCH, but that we had other
14 areas, some of these are mentioned, but they're
15 not -- they're not -- it doesn't document them
16 all.

17 The Wilson Bridge Road corridor, which
18 we were also doing specialized planning around.
19 I think we started that process earlier than
20 this one. The mall site, now called The Shops
21 at Worthington Place or High North. And we
22 thought there was some deficiencies in the
23 zoning code.

24 I believe we ultimately hired Katherine

1 Cunningham to assist our council in
2 understanding improvements to our code, and they
3 adopted a change in the code to allow for
4 planned unit developments, which our code, which
5 was largely written in the very beginning of --
6 well, it was largely written in the early
7 '70s -- didn't accommodate.

8 Q. Was the creation of the PUD and the -- I
9 guess the output from Ms. Cunningham's work --
10 did that occur before the 2014 comprehensive
11 plan update?

12 A. I don't specifically recall, but I
13 believe so.

14 --0--

15 (Deposition Exhibit 17 marked.)

16 --0--

17 BY MR. INGRAM:

18 Q. Mr. Greeson, you've been handed what's
19 been marked as Exhibit 17. And for purposes of
20 the record, Exhibit 17 is a letter from MKSK to
21 you, dated June 12, 2013, Bates numbered
22 Worthington 62382 through 62392. Do you see
23 that, Mr. Greeson?

24 A. Yes.

1 Q. Mr. Greeson, if you could turn to page 8
2 of 8 of the letter. Is that your signature
3 there on the authorization line?

4 A. Yes.

5 Q. Is this an engagement letter where the
6 city retained MKSK?

7 A. Yes.

8 Q. Directing your attention to page 7, the
9 prior page, under compensation. This engagement
10 letter covered \$41,460 for MKSK's services. Do
11 you see that?

12 A. Yes.

13 Q. Did the city pay any additional sums to
14 MKSK in connection with the 2014 comprehensive
15 plan update?

16 A. I don't remember.

17 I will comment I wish planning services
18 were \$41,000 nowadays.

19 MR. SCHUMACHER: I think it's time for
20 that morning break.

21 MR. INGRAM: We have been going about an
22 hour, Mr. Greeson. Do you want to take a break?

23 THE WITNESS: Yeah. I drank a lot of
24 coffee.

1 (Recess.)

2 BY MR. INGRAM:

3 Q. Prior to our break, Mr. Greeson, we were
4 reviewing Exhibit 17, the engagement letter from
5 MKSK to you. Do you recall that?

6 A. Yes.

7 Q. I was looking at the attachment to the
8 engagement letter, and there's terms and
9 conditions and proposal, and it's a little hard
10 to read, so I have a magnifying glass here,
11 should you need it. But it appears that your
12 initials are near where there are terms that
13 were crossed out?

14 A. What page are you on?

15 Q. Starting at page 62390, if you're
16 looking in the lower right-hand corner, so 90.
17 If you turn the page to 91, my question is
18 simply are those your initials?

19 A. Yes.

20 Q. So you reviewed, I take it, this
21 engagement letter and had the opportunity to
22 comment or strike anything that you disagreed
23 with; is that fair?

24 A. I don't remember. I may have signed off

1 on what the law director recommended as
2 provisions for striking. Not having -- I
3 haven't read all of the strike-throughs, but
4 obviously, I authorized them.

5 Q. Sure. And my question was simply, I
6 guess, you, or perhaps the city, had the
7 opportunity to review and revise or strike
8 anything that it disagreed with in this
9 engagement letter; is that fair?

10 A. Yes.

11 Q. And so either you or someone from the
12 city would have reviewed this engagement letter
13 before you signed it?

14 MR. SCHUMACHER: Objection. Relevance.

15 A. Yes. The degree to which we -- the
16 degree to which we actually reviewed it and my
17 personal review of it I don't recall.

18 ==0==

19 (Deposition Exhibit 18 marked.)

20 ==0==

21 BY MR. INGRAM:

22 Q. You've been handed, Mr. Greeson, what I
23 have been marked as Exhibit 18, which is the
24 City of Worthington launching visioning UMCH

1 process press release, Bates numbered
2 Worthington 62713. Do you see that?

3 A. Yes.

4 Q. And with respect to your position as
5 city manager, would you have reviewed this press
6 release before it was issued by Ms. Brown?

7 A. Maybe, but I don't specifically remember
8 reviewing it.

9 Q. Okay.

10 A. I may have, I may not have.

11 Q. So you didn't always?

12 A. I didn't always. She's very capable.

13 Q. This release was issued September 4,
14 2013, and it obviously references MKSK and
15 MKSK's work for the comprehensive plan update.
16 Do you recall why this press release was issued?

17 MR. SCHUMACHER: Objection. Relevance.

18 A. I don't recall. I imagine we were just
19 informing the public because it was important
20 property in our community.

21 Q. Okay. Thank you.

22 --0--

23 (Deposition Exhibit 19 marked.)

24 --0--

1 BY MR. INGRAM:

2 Q. Mr. Greeson, you've been handed what's
3 been marked as Exhibit 19, which is a memorandum
4 to you from Mr. Brown, dated September 27, 2013,
5 Bates numbered Worthington 28538 through 28539.
6 Do you see that?

7 A. Yes.

8 Q. I want to direct your attention to the
9 second page.

10 A. Let me read the document, if I may.

11 Q. Sure.

12 Mr. Greeson, as I indicated earlier, I
13 want to direct your attention to page 2 under
14 process. There's a reference to WARD, W-A-R-D,
15 in all caps. Who is WARD?

16 A. It's a group of citizens. WARD is an
17 acronym for Worthington Alliance for Responsible
18 Development. And they formed sometime during
19 this process, initially out of interest and
20 concern about how the UMCH property might
21 develop.

22 Q. Okay. And were there any city officials
23 or anyone from the city part of this WARD
24 organization?

1 A. I interacted a lot -- quite a bit with a
2 WARD planning committee, and they're -- to my
3 recollection, at this period of time, there were
4 no city officials involved in that planning
5 committee.

6 Q. At this point in time, you're referring
7 to September 2013?

8 A. Yes. Now, you may have something that
9 jogs my memory, but I -- I think it was mostly
10 people in the neighborhood around UMCH.

11 Q. So in connection with MKSK's work, WARD
12 was interviewed, obviously, and then there's a
13 reference to the CIC.

14 A. Uh-huh.

15 Q. So CIC also participated in interviews?

16 A. That's what this reflects. I don't
17 specifically recall who on the CIC and to what
18 extent they were interviewed.

19 Q. What is CVB?

20 A. Convention and Visitors Bureau.

21 Q. And how about the OWBA?

22 A. That organization -- kind of the
23 successor organization to that is Worthington
24 Partnership, but that would have been old

1 Worthington Business Association.

2 Q. And what does the Worthington
3 Partnership or the Worthington Business
4 Association do, if you know?

5 A. Essentially functions as a main street
6 organization advancing the vitality and economic
7 activity not only in Old Worthington but, you
8 know, throughout Worthington.

9 Q. Now to the background on page 1.
10 Mr. Brown wrote to you that the proposed
11 update -- and that's the comprehensive plan --
12 will further clarify how the community would
13 like to see the site, being the UMCH site,
14 develop in the future. Do you see that?

15 A. Yes.

16 Q. As the city manager, did you agree with
17 that characterization?

18 MR. SCHUMACHER: Objection. Relevance.

19 A. I think we were seeking to understand
20 what the -- what the community, you know, was
21 interested in.

22 Q. So did you agree with that
23 characterization?

24 MR. SCHUMACHER: Same objection.

1 A. well, I would have at that time.

2 However, I'm not sure we were successful in
3 having clear vision of what -- you know, what
4 the community wanted.

5 Q. But with respect to the update to the
6 comprehensive plan --

7 A. I would -- I would -- go ahead. I'm
8 sorry.

9 Q. With respect to the update to the
10 comprehensive plan, that was the goal, was to
11 solicit community input so that the city could
12 understand what the community would like to see
13 developed on that site into the future; is that
14 fair?

15 A. That would have been one of the goals,
16 yes.

17 MR. SCHUMACHER: I'm sorry, when was
18 this again?

19 A. This was in 2013. You know, obviously,
20 there's a lot that's happened since then. But
21 among the goals we were pursuing was to try to
22 understand community aspirations, and I think
23 that wasn't the sole goal, but that was one of
24 the goals, and we pursued that through the

1 process outlined here.

2 Q. Okay. Anything else? Any other --
3 you're pausing. I just want to make sure
4 you're -- you're finished answering the
5 question.

6 A. Yeah, I'm done.

7 Q. Okay.

8 --0--

9 (Deposition Exhibit 20 marked.)

10 --0--

11 THE WITNESS: We write a lot of memos,
12 don't we? Or did.

13 MR. SCHUMACHER: There's no question
14 pending.

15 BY MR. INGRAM:

16 Q. Mr. Greeson, I'm handing you what's been
17 marked Exhibit 20, which is a memorandum from
18 Darren Hurley, parks and recreation director, to
19 you, dated August 5, 2014. Do you see that?

20 A. I do.

21 Q. And just a few questions with respect to
22 Exhibit 20, Mr. Greeson. First of all, Darren
23 Hurley was the city's parks and recreation
24 director in 2014; is that correct?

1 A. Yes. And he is currently the city's
2 parks and recreation director.

3 Q. Okay. And attached to his memorandum to
4 you was a position statement, dated July 23rd,
5 2014, to the Worthington City Council from the
6 Worthington Parks and Recreation Commission. Do
7 you see that?

8 A. I see that.

9 Q. What is the Worthington Parks and
10 Recreation Commission?

11 A. It's an advisory commission to the City
12 Council and the city on issues related to our
13 parks and recreation department and system.

14 Q. And what is the parks and recreation's
15 director involvement with the parks and
16 recreation commission?

17 A. He is the staff liaison to it.

18 Q. Thank you.

19 How are the commissioners selected? Are
20 they appointed or --

21 A. They are appointed by City Council.

22 Q. And who is Bob Burpee?

23 A. He was a member of the Parks and
24 Recreation Commission, and at the time -- I

1 don't know if he is still -- a resident of the
2 city.

3 Q. In Mr. Hurley's memo to you, he's
4 conveying to you that the Parks and Recreation
5 Commission made a motion that the Parks and
6 Recreation Commission urges City Council to
7 consider every opportunity available to maximize
8 the amount of UMCH property designated as park
9 space for the community.

10 Do you see that?

11 A. Yes.

12 Q. Do you recall that happening?

13 A. I recall this memorandum and
14 recommendation, or input into the process, yes.

15 Q. Did you participate in the input in the
16 process of reaching this recommendation?

17 A. No, other than attending the meeting --
18 Mr. Hurley probably attending the meeting. I
19 don't recall that we -- I didn't participate in
20 the Parks and Recreation Commission's
21 discussion, that I recall.

22 Q. Okay.

23 A. Nor do I recall even asking for their
24 feedback.

1 Q. Okay. Fair enough.

2 In their letter to City Council, the
3 commission said that, in a perfect world, we
4 would like for the site to be 100 percent
5 parkland and recreation space available for
6 community access and events.

7 Do you see that? It's at the bottom of
8 the first page of their letter.

9 A. Yes, I see what's written.

10 Q. And they go on on the next page to say
11 that, with that said, we realize that the city
12 and parks department have limited resources to
13 purchase and to maintain such a large parcel of
14 land.

15 Do you see that?

16 A. I do see that written.

17 Q. Were there discussions about purchasing
18 any portion of the UMCH property for a park
19 then?

20 A. We had no serious conversations or
21 interest in acquiring land at that time, so
22 this, that I recall, was not used to instigate,
23 you know, an active acquisition effort. It was
24 just input into the process that was, you know,

1 taken in like any other piece of information. I
2 don't have a specific recollection about
3 acquisition conversations, but I know that our
4 posture, if you will, at that time was that we
5 were interested in park space as a balance -- a
6 component of a balanced overall development
7 plan, not in acquisition of the site.

8 Q. Okay. And you mention in your answer
9 "at that time." You're referring to the fall of
10 2014?

11 MR. SCHUMACHER: It was August 5th,
12 2014, to be accurate.

13 A. Yeah. I would say just generally in
14 this time. There's no serious effort or what I
15 would call robust conversation regarding
16 acquisition. Any dialogue or analysis related
17 to that was -- I don't specifically recall.
18 There may have been some. Mostly -- because
19 citizens and other people were saying why don't
20 you guys buy it, you know, asking those kind of
21 questions, and I recall answering, well, we
22 believe we can achieve meaningful park space as
23 a component part of an overall balanced
24 development. And generally, the council and

1 management at that time did not have any
2 interest in acquisition of the property as, you
3 know, referenced in this perfect world
4 description on the second page of the document
5 you handed me.

6 Q. In 2014?

7 A. In 2014.

8 Q. And I just have what's previously marked
9 as Exhibit 1. And this is the land use plan.

10 MR. SCHUMACHER: That's the whole thing.
11 My Exhibit 1 only has -- wait a minute.

12 Q. Mr. Greeson --

13 MR. SCHUMACHER: The one you handed me
14 yesterday has only --

15 MR. INGRAM: Counsel, it's the same
16 exhibit.

17 MR. SCHUMACHER: Oh, you had a whole
18 book there. I'm sorry.

19 MR. INGRAM: The binder I'm referring to
20 has all the exhibits from yesterday.

21 MR. SCHUMACHER: Thank you.

22 BY MR. INGRAM:

23 Q. Mr. Greeson, I just wanted for your
24 benefit to see the City Council's comprehensive

1 plan update that was adopted on September 2nd of
2 2014. Do you see that?

3 A. Yes.

4 Q. And my question is that, based on the
5 fact that City Council adopted this update in
6 September of 2014, meanwhile, looking at Exhibit
7 20, you have a recommendation made to City
8 Council in July of 2014, would City Council have
9 considered this recommendation prior to adopting
10 the comprehensive plan update?

11 A. When you say considered, what do you
12 mean? Acted upon it?

13 Q. Would it have reviewed and considered in
14 connection with the 2014 comprehensive plan
15 update.

16 A. I'm sure we transmitted it to them.
17 They reviewed it. My memory is that they took
18 it in as, you know, opinion of one of our
19 commissions. I don't think they gave it a lot
20 of weight. And it certainly didn't guide any --
21 it didn't result in any direction to the staff
22 to do anything but continue the process as we
23 were -- as we were doing. In fact, I think some
24 of the councilmembers didn't like that they were

1 weighing in and weren't interested in
2 acquisition and found this a little
3 inconvenient.

4 That being said, the parks commission
5 has no role in zoning. Their role might be to
6 offer ways to improve the park system, so it's
7 not surprising that people that love parks and
8 desire to be on a park commission might want
9 more parks. But Worthington does a good job of
10 everybody respecting their roles, and it would
11 have been input into the process. The planning
12 commission's role was to make the recommendation
13 on the overall plan to the City Council.

14 Q. In 2014, did the city have the funds to
15 spend or purchase the UMCH property for a park?

16 MR. SCHUMACHER: Objection. Relevance.
17 Answer if you know.

18 A. I can't speak to the specific balances
19 in 2014 without going back and reviewing those
20 documents, but we certainly had some financial
21 constraints. would have been concerned about
22 expending a large sum of money on new park
23 acquisition that that both cost upfront capital
24 and money to develop ongoing maintenance. And

1 believed that, again, with a balanced
2 development, you know, there could be, you know,
3 amenities and park space that was part of the
4 development without having to acquire property.

5 Q. Okay. Fair enough.

6 --0--

7 (Deposition Exhibit 21 marked.)

8 --0--

9 BY MR. INGRAM:

10 Q. Mr. Greeson, I've handed you what's been
11 marked as Exhibit 22 -- or 21. And Exhibit 21
12 is entitled the UMCH Focus Area Checklist. It's
13 on the planning and building letterhead, and
14 it's Bates numbered Worthington 28377 through
15 28380. Do you see that, Mr. Greeson?

16 A. Yes.

17 Q. And I'll represent to you that from the
18 metadata of the file it looks to have been from
19 the March 4, 2015, date. For our purposes, just
20 to orient on the timing space and our
21 discussion, at least from the metadata, this
22 looks to be from March of 2015. Do you
23 recognize this document?

24 A. No. That doesn't mean I didn't see it

1 at the time.

2 Q. Sure.

3 A. I don't recall it.

4 Q. With your involvement with the UMCH
5 focus area as the city manager, would you have
6 expected that the planning and building folks
7 provide you a copy of this checklist?

8 A. They may have. But it wouldn't have
9 been necessary as long as it was, you know,
10 drawn from the plan itself. It appears to me to
11 be an internal tool to help, you know, guide
12 evaluation and not -- seek to not miss things
13 that were important. It may not be
14 all-inclusive, and I don't have a specific
15 memory of its use.

16 Q. Okay. Who would have prepared this, if
17 you know?

18 A. I expect it would be Mr. Brown, although
19 I don't specifically know that he prepared it.
20 Ms. Bitar may have contributed to it.

21 Q. Was it standard to create checklists for
22 the redevelopment of private property in the
23 city?

24 A. I don't know. I don't know if they had

1 an internal -- I don't know if they did this
2 regularly or not. They're very detail oriented.
3 So if there are other checklists like this,
4 there may be. I'm not sure.

5 Q. while you were city manager, were you
6 ever presented with a checklist of this nature
7 on any other project?

8 A. I don't recall. And I think you also --
9 you know, this is probably one of the, again,
10 most context sensitive larger sites. A lot of
11 moving parts and pieces, and so certainly some
12 kind of tool to make sure that details aren't
13 lost. And the evaluation process is important,
14 so I would have viewed this as good
15 administration for a more complex project or
16 site, and -- but I don't -- this has been a lot
17 of time and so I don't -- there's been a lot of
18 things that have happened since then and I
19 don't -- I don't have a specific memory of this
20 checklist or any others.

21 Q. when Lifestyles submitted its
22 application to rezone the property in the 2020
23 time period, did the city create -- did anyone
24 from the city create, to your knowledge, a

1 checklist similar to this?

2 A. I honestly don't recall.

3 Q. Did you see one?

4 A. I don't recall whether I did or not.

5 --0--

6 (Deposition Exhibit 22 marked.)

7 --0--

8 BY MR. INGRAM:

9 Q. Mr. Greeson, you've been handed what's
10 been marked as Exhibit 22, which is an email
11 from you to Lee Brown and Jeff Harris, dated
12 July 30, 2015, and it's actually an email chain,
13 I'll call it. Do you see that?

14 A. Uh-huh.

15 Q. And --

16 A. Yes.

17 Q. And just for the record, the email
18 address that's listed here in the from line, is
19 that -- was that your Worthington email address?

20 A. It was at the time. It changed later to
21 at worthington.org. But yes, that was the --
22 that was my email at the time.

23 Q. Okay.

24 A. It appears.

1 Q. And you were sending an email about a
2 grant program in which the subject was \$3.1
3 million of Clean Ohio Conservation Funds
4 available for Franklin County, and in your email
5 you say that I want to discuss this in
6 relationship to UMCH. Do you see that?

7 A. Uh-huh.

8 Q. And in the email that you're
9 forwarding --

10 A. Yes, I should say.

11 Q. Good catch.

12 In the email that you were forwarding,
13 this grant program says that the funds can be
14 used to acquire green space and/or repair --
15 and/or restore riparian corridors.

16 Do you recall that?

17 A. I see that I did it. I don't have it --
18 yes, I recall it.

19 Q. Okay. With respect to the UMCH
20 property, what did you do with respect to
21 pursuing any grant funds?

22 A. I think -- going off faded memory here,
23 but I think this was just internal staff looking
24 at grant funds that may become available and

1 discussing whether or not it had applicability
2 to the UMCH property. And in this program it
3 would have been, you know, kind of the Tucker
4 Creek area. There were times in the dialogue
5 with -- internally and with the community where
6 we were hearing that there was a desire to park
7 space that we said, well, if we needed to do
8 that as part of a development, there's ways to
9 accomplish that. You can acquire it, you can
10 try to -- you can ask the developer to do it,
11 you can, you know, seek grant funds so it's not
12 all on the back of the developer, or not all
13 financially required by the developer. And we
14 were just imagining approaches to addressing the
15 questions that we were getting from the
16 community.

17 we didn't apply for any grant funds. We
18 weren't directed to apply for any grant funds.
19 I don't think we ever had any serious
20 conversation with council about applying for
21 grant funds, or nor did we take any of the
22 actions that would be necessary to actually
23 initiate acquisition of property like talking to
24 the property owner, appraisals, acquisition

1 attorneys, all of that stuff. It was mostly
2 internal research.

3 Q. Okay. And with respect to this
4 particular grant opportunity and its
5 relationship or connection to the UMCH property,
6 you were reviewing this in connection with
7 acquiring green space, not to restore riparian
8 corridors, correct?

9 MR. SCHUMACHER: Objection. Misstates
10 his prior testimony.

11 A. I think the area -- my knowledge of this
12 program, which is limited, is that in order to
13 be successful in obtaining funds, you got to
14 think about the conservation benefit of the
15 project. So acquiring green space would -- it
16 would be most successful if it included
17 repairing corridors, which on that property
18 is -- that property being the LC property -- is
19 the Tucker Creek area. So I'm not -- I'm not
20 sure where your question is going with that.

21 Q. Well, I guess, I just wanted to
22 understand whether there were any issues with
23 the Tucker Creek area that needed repair or
24 restoration, or if you're saying --

1 A. I don't know the answer to that.

2 Q. Okay.

3 A. This was just seeing a grant opportunity
4 and asking my staff to look into its
5 applicability and utility for, you know, that
6 site.

7 Q. Gotcha. That makes sense.

8 MR. SCHUMACHER: This would be going
9 much faster if Emily were here. History lesson.

10 THE REPORTER: Sometimes I cannot hear
11 you, Mr. Schumacher.

12 MR. SCHUMACHER: Oh, believe me, you
13 don't want to hear me.

14 MR. INGRAM: No, I think she needs to
15 hear you so all of your comments can go on the
16 record, Mr. Schumacher.

17 MR. SCHUMACHER: I think you're doing a
18 fine job, Chris. You heard that, right?

19 --0--

20 (Deposition Exhibit 23 marked.)

21 --0--

22 BY MR. INGRAM:

23 Q. Mr. Greeson, I've handed you what's been
24 marked as Exhibit 24, which is an email from

1 Scott Myers to you, dated August 23rd, 2016.

2 And again, this is an email chain, for purposes
3 of the record. Do you see that?

4 A. Yes.

5 Q. Mr. Myers was a member of City Council
6 at the time, correct?

7 A. Yes.

8 Q. And --

9 MR. SCHUMACHER: Have you had a chance
10 to read it?

11 THE WITNESS: Give me one more minute,
12 please.

13 MR. INGRAM: Sure. Sorry. I thought he
14 had already read the email chain.

15 A. Okay.

16 Q. Turning to the second page of Exhibit
17 24, there is an email from David Robinson to
18 you, CC'ing Bonnie Michael. Do you see that?

19 A. Yes.

20 Q. Do you recall receiving this message?

21 A. I recall the meeting. I don't recall
22 the specific message.

23 Q. When you're referring to the meeting,
24 which meeting are you referring to?

1 A. I believe the meeting of 8-24, or
2 meetings in that time frame.

3 Q. And who was that meeting with?

4 A. Representatives of WARD, OWA, and then I
5 believe Mr. Robinson. Members of the community,
6 I should say, that were interested in the UMCH
7 project.

8 Q. And Mr. Robinson, is this David
9 Robinson, the current president of the City
10 Council of Worthington?

11 A. Yes.

12 Q. And beneath his signature line of his
13 email it says, Keep Worthington Beautiful in
14 italics. Do you see that?

15 A. Yes.

16 Q. What was Keep Worthington Beautiful, or
17 what is it?

18 A. Keep Worthington Beautiful was a -- was
19 a campaign -- well, that was the nomenclature or
20 marketing slogan, whatever you would call it --
21 I'm not sure -- of the group that led a process
22 to amend the charter, which was Issue 38 on the
23 ballot and extended the time frame in which
24 signatures could be collected to place on the

1 ballot, voter consideration of a zoning
2 amendment.

3 Q. And at this time Mr. Robinson was not on
4 City Council, correct?

5 A. I don't believe so. I can't remember
6 the exact date he got elected, but no, I don't
7 think so.

8 Q. And based on your meetings with
9 Mr. Robinson, what was his role within the Keep
10 Worthington Beautiful campaign or whatever you
11 want to call it?

12 A. I don't think I'm the one that can
13 define his role. He was one of the leaders, I
14 would -- what that entailed, you'd have to ask
15 him.

16 Q. Sure. He was reaching out to you and
17 had met with you and obviously discussed the
18 UMCH property?

19 A. I had not had extensive conversations
20 with Mr. Robinson about the property. He was,
21 sometime in this time frame, beginning to join
22 kind of some of the conversations that had been
23 ongoing, mostly questions that I was getting
24 from other citizens and that kind of had formed

1 themselves in groups like WARD and OWA. And so
2 he was an additional citizen part of those
3 groups that were, you know, cross-collaborating
4 and asking city officials questions.

5 Q. Sure. And looking at his email to you
6 in Exhibit 24, one of his questions is about
7 what an eventual park or green space would look
8 like on the UMCH property, fair?

9 MR. SCHUMACHER: Did he ask that
10 question?

11 A. I think he says the opposite. So
12 questions about -- I'm reading from the second
13 page of the document you provided me. It says,
14 questions about what an eventual park would look
15 like or how green space fits in with other goals
16 are premature at this point since they can only
17 be addressed after the residents obtain and
18 study the information we have requested. And
19 there was a bunch of information they requested
20 that I had to take a while to compile and
21 respond to.

22 Q. And what were their questions about that
23 you were compiling and responding to?

24 A. I would have to review the record to

1 answer that question specifically because there
2 was a volume of questions. It included
3 financial information, planning information, and
4 then more generally kind of the conceptual
5 options that are available to cities, you know,
6 when dealing with, you know, property
7 redevelopment.

8 Q. Those questions did include, however,
9 questions about locating a park or additional
10 green space on the UMCH property, correct?

11 A. Again, I would have to review the memos
12 that I wrote in response to them to recall the
13 specific questions that they answered -- they
14 asked. But that was one of their interests.

15 Q. Okay. All right. That being one of
16 their interests, you're referring to their
17 interest in a green space or park; is that fair?

18 A. Yes, and how cities accomplish that as
19 part of -- either as part of development or
20 strategies for accomplishing that as well as
21 other goals.

22 Q. And I think, if we turn to Councilman
23 Myers' email to you, he seems rather frustrated
24 that they're referring -- they being

1 Mr. Robinson refers to green space and park, but
2 doesn't define what that even means. Do you see
3 that?

4 MR. SCHUMACHER: Objection. What's the
5 question? If he sees that?

6 Q. You can answer, Mr. Greeson.

7 MR. SCHUMACHER: Because you didn't
8 quote that exactly.

9 A. I'm sorry, I was reading while you were
10 asking.

11 MR. SCHUMACHER: Excuse me. I'm
12 objecting because you didn't quote it exactly,
13 and now you then asked him a question if he sees
14 it. So all I want to know is, what are you
15 asking him?

16 MR. INGRAM: Well, counsel, my question
17 was clear, was straightforward.

18 MR. SCHUMACHER: No, it wasn't.

19 MR. INGRAM: I'm not going to sit here
20 and read documents to him and ask him whether I
21 read it correctly or not. There's a waste of
22 time.

23 MR. SCHUMACHER: No. You --

24 MR. INGRAM: Can you let me finish

1 talking before you start?

2 MR. SCHUMACHER: Yes. Please do.

3 Please.

4 MR. INGRAM: We're not going to sit
5 here -- I'm not going to read statements or
6 content from these exhibits and ask the witness
7 whether or not I read it correctly. All I am
8 doing is directing his attention to the portion
9 of the document.

10 MR. SCHUMACHER: Are you finished?

11 MR. INGRAM: Go ahead.

12 MR. SCHUMACHER: You misquoted the
13 document and then asked him if he sees that.
14 That question is imprecise. If you're asking
15 him if he sees the quote in the document, that's
16 a different question. But you can't misquote
17 the document and then say, do you see that. All
18 right? That is a misleading question. So all
19 I'm saying is if you want to ask him if he sees
20 a sentence of the document, please do so. Don't
21 misquote the sentence and then ask him if he
22 sees that.

23 MR. INGRAM: Counsel, I have never said
24 I was quoting the document, number one. Number

1 two --

2 MR. SCHUMACHER: That's true.

3 MR. INGRAM: -- if you would stop with
4 the speaking objections and just object to the
5 form, this could really go a lot faster.

6 BY MR. INGRAM:

7 Q. Mr. Greeson, do you understand my
8 question?

9 MR. SCHUMACHER: I'd like to make sure
10 the record is clear.

11 A. No, I don't, because my ability to
12 multitask is apparently not as good as I thought
13 it was. I was trying to read and listen to you
14 at the same time, which I was unsuccessful at.
15 Could you repeat your question?

16 Q. All right. Have you had an opportunity
17 to review Mr. Myers' email to you on Exhibit 24?

18 A. I have read it as it is in front of me
19 here today.

20 Q. Reading his email, at least to me he
21 appears frustrated. Do you agree with that?

22 MR. SCHUMACHER: Objection.

23 A. I'm not going to characterize Mr. Myers'
24 posture on this email.

1 Q. Okay. He's making reference to
2 Mr. Robinson's use of the terms green space and
3 park. Do you see that?

4 A. Yes.

5 Q. And Councilman Myers is noting that
6 Mr. Myers doesn't define what that means, what
7 he's referring to as either a green space or
8 park. Do you see that?

9 MR. SCHUMACHER: Objection.

10 A. I do see that. I think he's having a
11 hard time discerning what would satisfy his
12 constituents.

13 Q. "His constituents" being Mr. Robinson?

14 A. "His constituents" being all of the
15 voters of Worthington, of which at the time
16 Mr. Robinson was one.

17 Q. He goes on to say that they still want
18 us to do all their work with no real guidance of
19 what they want. Do you see that?

20 A. I do see that.

21 Q. What was your understanding of what
22 Mr. Robinson wanted the city to do?

23 MR. SCHUMACHER: Objection.

24 A. There's a timing issue here. I'm not

1 sure at this time. I can say that members of
2 the group that I met with -- and I would put
3 Mr. Robinson in that category -- were desirous
4 of, you know, a significant park and believed
5 that the work we had done on the comprehensive
6 plan did not reflect a community consensus and
7 was, you know, not the right strategic
8 direction.

9 And so not all -- I don't think you can
10 characterize all people that were involved in
11 WARD and OWA and Keep Worthington Beautiful as
12 having the same thought process. Although they
13 worked together, they may have different
14 opinions, but I think he was interested in a
15 significant park space.

16 Q. And a significant park space being on
17 the UMCH property?

18 A. Yes. And -- and disagreed probably with
19 some of the strategies and goals outlined in the
20 comprehensive plan and reflected a body of
21 people in the community that thought differently
22 about that than maybe others.

23 Again, it was a center of a lot of
24 controversy, very context sensitive site, a lot

1 of people cared about -- and still care about
2 what happens to it. So central to the future of
3 the city. And there were strongly held beliefs
4 about the directions we would take.

5 So my posture at the time was to -- just
6 be clear about it, my posture at the time was --
7 we're talking 2016. There was no development
8 application by UMCH or Lifestyle, whoever was in
9 control of it at the time. And I was trying
10 to -- they weren't very -- you know, they
11 weren't communicating. I'm not sure there was
12 anything that they had put out there that the
13 community could absorb. So we were fielding
14 questions, trying to answer questions, and
15 provide information that might inform the public
16 dialogue about the future of, you know, what the
17 city -- the future of the property and the
18 city's position towards it.

19 And so I felt obligated at the time to
20 respond to citizens' questions and at least meet
21 with them and help, you know, create a better
22 climate for good decision-making.

23 Q. Okay. And Exhibit 23 is from the 2016
24 time frame. Do you recall that Lifestyle had

1 previously provided the community with
2 conceptual plans and held a large public meeting
3 at the WEC in around the 2015 time frame?

4 A. Yes. Here we were maybe a year later.

5 Q. Give or take.

6 A. Yeah. And -- yes, give or take. Not
7 recalling the specific date of the meeting at
8 the WEC. And they had, you know, not come
9 forward with anything new, that I recall.

10 MR. SCHUMACHER: Objection.

11 A. "They" being --

12 MR. SCHUMACHER: Go ahead. I'm sorry.

13 A. "They" being Lifestyle. Representatives
14 of Lifestyle or anybody else from UMCH, there
15 was nothing new under the sun, and so,
16 therefore, I think members of the community were
17 starting to ask questions, wondering what the
18 future would be, and suggesting that, you know,
19 potentially our planning was flawed.

20 Now that I provided that answer, I'm
21 going to go use the bathroom real quickly,
22 because I've obviously had more coffee than
23 everyone else.

24 MR. INGRAM: All right. Let's take a

1 break.

2 (Recess.)

3 BY MR. INGRAM:

4 Q. Mr. Greeson, we are back from our second
5 break.

6 A. I'll drink a little less.

7 Q. When did the city first become aware of
8 Lifestyle's interest to purchase the UMCH
9 property?

10 MR. SCHUMACHER: Objection. The city,
11 or Mr. Greeson?

12 A. I can't recall specifically. In and
13 around the time we adopted the 2014
14 comprehensive plan amendment, I think.

15 Q. So clearly before the meeting at the
16 WEC?

17 A. Oh, yes. Yes.

18 Q. And do you recall how the city learned
19 of Lifestyle's involvement with the property?

20 A. I don't have a specific recollection of
21 it.

22 --0--

23 (Deposition Exhibit 24 marked.)

24 --0--

1 BY MR. INGRAM:

2 Q. Mr. Greeson, I've handed you what's been
3 marked as Exhibit 24, which is an email from Lee
4 Brown to you, dated January 18, 2018. Do you
5 see that?

6 A. Yes. I'd like a chance to finish
7 reading it, please.

8 Q. Sure.

9 Have you read the --

10 A. Yes, I have. I've read the memo you put
11 in front of me, Exhibit 24.

12 Q. Exhibit 24 is an email --

13 A. Yes.

14 Q. -- from Mr. Brown to you, correct?

15 A. Yes.

16 Q. And the subject of the email is UMCH
17 talking points, correct?

18 A. It is.

19 Q. And so is Exhibit 24 something that you
20 would have -- an email that you would have
21 received and reviewed from Mr. Brown?

22 A. Yes.

23 Q. Do you recall this particular
24 circumstance in which Lifestyles was seeking to

1 split off 5 acres of the property for a
2 development?

3 A. I generally recall the issue. I didn't
4 remember the specific email.

5 Q. Sure. And what do you recall from that
6 issue?

7 A. Basically what's outlined here in
8 Exhibit 24, and that they didn't pursue that, to
9 the best of my recollection, but that we --
10 Mr. Brown did his job, which was to communicate
11 with interested parties about what the
12 requirements and the codified ordinances
13 would -- would need to be followed.

14 Q. Okay. And do you recall why the 5 acres
15 depicted on the second page of Exhibit 24 were
16 not ultimately split off or why this was not
17 completed?

18 A. I don't specifically recall, although
19 you might produce something that jogs my memory.
20 I don't specifically recall.

21 Q. Okay.

22 --0--

23 (Deposition Exhibit 25 marked.)

24 --0--

1 MR. SCHUMACHER: That's a jump.

2 BY MR. INGRAM:

3 Q. Mr. Greeson, I've handed you what's been
4 marked as Exhibit 25, which is an email chain,
5 and I'm going to focus on the email from you to
6 members of City Council and others dated March
7 31st, 2020, the subject of which was the
8 OhioHealth UMCH project formal withdrawal of
9 zoning application. Do you see that?

10 A. Yes.

11 Q. And do you recall sending this email?

12 A. I don't have a specific recollection of
13 sending this email, but I did, and it would be
14 the type of thing I might provide to council in
15 order to inform them about what was happening --
16 important things that were happening in the
17 community.

18 Q. Okay. Did you have conversations with
19 anyone from OhioHealth about the zoning
20 application for their use of the UMCH site?

21 A. I believe I was in some meetings related
22 to this application, not all of them. And
23 yes -- so the answer to your question is yes,
24 although I don't have a specific recollection of

1 which meetings on what date or the content of
2 those meetings.

3 Q. Sure. Just generally, you're referring
4 to meetings, plural. Were there a lot of
5 meetings? How many meetings --

6 A. You would have to ask Mr. Brown. I
7 don't have a specific recollection.

8 Q. And that was going to be my next
9 question. Who would have joined you in those
10 meetings from the city?

11 A. The staff that were involved in
12 development review, Mr. Brown, and potentially
13 others depending on -- well, let me back up.
14 OhioHealth had two forays into this site and
15 interest in the site. One was first -- or this
16 area. The first one was potentially developing
17 a smaller office building and stand-alone
18 ER/urgent care kind of thing in the parking lot
19 of the West Ohio Conference, which was later
20 subdivided from the larger UMCH property.

21 Then they also looked at the corner of
22 Larrimer and High Street, which I think is
23 what's being referenced here. And so the staff
24 worked with OhioHealth in both iterations, one

1 of which would have not required a rezoning. It
2 would have been a subdivision. And then a
3 larger building that did require rezoning on the
4 corner. And I think in both instances, you
5 know, were supportive, and we worked with them
6 professionally and diligently through the
7 process, as we would with anybody.

8 Q. And with respect to OhioHealth's
9 rezoning application to utilize the corner of
10 Larrimer and High Street --

11 A. Yes.

12 Q. -- that's part of the UMCH property, or
13 the UMCH site, correct?

14 A. Yes. There were two homes that weren't
15 part of it that it's my understanding LC has
16 purchased. I don't specifically recall when
17 they purchased those in relationship to this
18 OhioHealth project, but yes, the corner -- the
19 vacant land at the time, that corner is part of
20 the UMCH site.

21 Q. And the corner from Larrimer and High,
22 would that project for OhioHealth have required
23 the rezoning? I'm trying to decipher which of
24 the two projects you referenced would have

1 required the rezoning. That's all.

2 A. So I don't have a recollection of the
3 technical issues associated with this project.
4 You'd have to ask Lee about that and why it
5 required a rezoning and what pieces, you know,
6 triggered that or caused that. But yes, we
7 worked with them.

8 Q. And chronologically, you referenced two
9 OMCH proposals for this property, the UMCH
10 property?

11 MR. SCHUMACHER: Excuse me. OMCH?

12 MR. INGRAM: Strike that. Let me start
13 over.

14 MR. SCHUMACHER: See, I'm listening.

15 BY MR. INGRAM:

16 Q. You referenced two OhioHealth projects
17 for use of the UMCH site. Just chronologically,
18 which came first, the Larrimer and High project
19 or the other project?

20 A. My recollection, subject, you know, to
21 looking at the record, was that the project that
22 would have been placed in what is now a portion
23 of the West Ohio Conference's parking lot came
24 first. Second came the corner of Larrimer and

1 Longfellow. And then somewhere in there the
2 West Ohio Conference exercised what I presume
3 was their right under whatever contractual
4 relationships exist between them and UMCH to
5 split off the land that they sit on, making the
6 parent parcel smaller.

7 Q. Because it was 40-something acres and
8 now it's 37?

9 A. Correct. So the frontage on High Street
10 and the overall acreage is smaller as a result
11 of that decision.

12 Q. And earlier you said that we supported
13 OhioHealth's projects. Who's the "we" that
14 you're referring to?

15 A. Yeah. Let me characterize that.
16 Basically staff. I think we thought it was
17 consistent with the -- we thought the existing
18 zoning supported commercial development in that
19 area and was appropriate use for that corner.
20 But I don't -- what I don't recall is whether it
21 ever led to any specific recommendations. My
22 memory is that at least one of those was
23 prepared to be put on the agenda and -- for
24 voting before it was withdrawn, and then, you

1 know, I think OhioHealth had done community
2 engagement and, you know, discussed the issue
3 fairly openly and were, you know, moving towards
4 more formal decisions before they withdrew.

5 Q. And do you recall the circumstances that
6 led to the withdrawal of the application?

7 A. I can't specifically remember at this
8 point.

9 Q. Do you know why they did?

10 A. My indirect understanding, not based on
11 direct knowledge, is that they couldn't reach
12 terms with Lifestyle. But I'm not party to that
13 conversation, so I don't know directly.

14 Q. And what is your indirect knowledge
15 based on?

16 A. I don't remember.

17 Q. Okay. Just something you think you
18 heard or --

19 A. Yes.

20 Q. Do you recall from whom?

21 A. No. I don't recall there was any
22 specific concern with the city.

23 --0--

24 (Deposition Exhibit 26 marked.)

1 office facility on High Street.

2 A. Are we talking about 26?

3 Q. 26. Yes.

4 MR. SCHUMACHER: Exhibit.

5 A. Exhibit 26. Yes. That's the project in
6 the parking lot of the West Ohio Conference, as
7 I described earlier.

8 Q. Okay. And so when you were -- when you
9 described the two different proposals, the first
10 one in time would have been the project outlined
11 in -- or you summarized in Exhibit 26, fair?

12 A. Yes.

13 Q. Okay. And then the second proposal had
14 an actual formal application, and that's the
15 proposal at Larrimer and High Street, which is
16 referenced in Exhibit 25; is that accurate?

17 A. So you'll have to ask Lee or look at the
18 record. The 30,000 square foot OhioHealth
19 medical office facility may have also had a
20 formal application, but if my memory serves me
21 correct, it would have been a subdivision, not a
22 rezoning application.

23 I want to correct you. No, they may
24 have both -- they may have both had formal

1 applications. They're just applying for
2 different things.

3 Q. Got it. So there was only one rezoning
4 application that you were referencing earlier;
5 there may have been another type of approval
6 associated with the first project?

7 A. That's what my memory is. Again, I
8 think Mr. Brown would -- or the record might
9 clarify that.

10 Q. And do you know what happened with
11 OhioHealth's first proposal that's referenced
12 here in Exhibit 26, why that didn't go forward?

13 A. My memory is that the West Ohio
14 Conference decided to exercise whatever
15 authority they had related to their property and
16 to go ahead and purchase it and subdivide it off
17 from the larger UMCH parcel and ultimately
18 concluded it wasn't interested in moving forward
19 with part of their parking lot being developed.

20 Obviously, as city manager, I'm not
21 party to the private conversations between the
22 West Ohio Conference, the United Methodist
23 Children's Home, and Lifestyle, if they were
24 involved. But I think the zoning and

1 subdivision laws weren't the issue. I think the
2 issue was, you know, private.

3 Q. Okay. But do you have any direct
4 knowledge of what the issue was?

5 A. I was not directly involved in it, no.

6 Q. And did the West Ohio Conference
7 ultimately, then, continue to use the portion
8 that they subdivided; in other words, are they
9 still there today?

10 A. I believe they are still here today.

11 --0--

12 (Deposition Exhibit 27 marked.)

13 --0--

14 BY MR. INGRAM:

15 Q. Mr. Greeson, I've handed you what's been
16 marked as Exhibit 27, which is a memorandum from
17 Management Partners to you and Robyn Stewart,
18 dated April 2nd, 2018, with Bates numbered
19 worthington 55122 through 55159. Do you see
20 that?

21 A. Yes, I do. Can you give me -- this is a
22 substantial document. Can you give me just a
23 few minutes?

24 Q. Sure. If you want to skim through the

1 document and refamiliarize yourself with it.

2 I'm not going to ask you a significant number of
3 questions about the content of the memorandum,
4 but take as much time as you like.

5 A. Okay. Thank you.

6 Okay.

7 Q. Mr. Greeson, have you had an opportunity
8 to review all of Exhibit 27?

9 A. I have skimmed it, not read it
10 thoroughly.

11 Q. Okay. It's our understanding that City
12 Council holds annual retreats.

13 A. Not always annual.

14 Q. Okay.

15 A. But periodic.

16 Q. Okay. And do you recall, did City
17 Council conduct a retreat in 2018?

18 A. Yes.

19 Q. Okay. And would this Exhibit 27, the
20 memorandum from Management Partners, have been
21 in connection with one of City Council's
22 retreats?

23 A. Yes.

24 Q. Okay. Why did City Council hold these

1 retreats?

2 A. I don't recall the specific one. What
3 the rationale is, one, because it's a good
4 practice. Two, often to build relationships,
5 develop priorities or focuses for the year, to
6 work through issues, if there are any that need
7 to be specifically discussed in a retreat
8 setting, and to spend time outside of a formal
9 council meeting where there's business decisions
10 that need to be made, you know, to talk about
11 strategic direction, goals, how we work
12 together, and how we can work better together.

13 And so this report reflects a lot of
14 conversation, as you can see, about council
15 expectations of staff, how council wants to work
16 together and a variety of things that the city
17 was working on at the time.

18 Q. And these City Council retreats are
19 considered public meetings?

20 A. Yes, always public meetings.

21 Q. Are records kept from what's discussed
22 at those public meetings?

23 A. This is the record in summary or
24 minutes, I believe, if you will, of the meeting.

1 Q. Okay. And members of council attend the
2 meeting -- the retreats, obviously. And what
3 city staff attends?

4 A. Different at different times. So
5 sometimes it's just been the manager and the law
6 director, a few key staff. Sometimes it's the
7 entire directors group, so all of the department
8 directors. Other times it's been like Friday
9 night just the council and management, and then
10 Saturday the directors would come in. So it's
11 varied. It depends on what we're discussing.
12 And I don't specifically recall the attendance
13 of --

14 Q. Sure. I'm asking you generally.

15 A. Yes, generally.

16 Q. Does anyone from the city maintain
17 records as far as who attended the particular
18 retreat or what was discussed, things of that
19 nature?

20 A. Exhibit 27 is the City's record.

21 Q. Okay.

22 A. There may also be additional records
23 that reflect who was there and, you know, what
24 was done, but I don't know that I can speak to

1 those at this point.

2 Q. So Management Partners is obviously a
3 third party or a consultant, correct?

4 A. Yes.

5 Q. And so the city, I take it, from time to
6 time utilized facilitators for these retreats;
7 is that fair?

8 A. Yes.

9 Q. And the city is relying on the
10 facilitator to provide the written record or the
11 notes for council's benefit; is that fair?

12 A. Yes.

13 Q. Did City Council utilize a facilitator
14 at all of its annual retreats?

15 MR. SCHUMACHER: You're asking during
16 his tenure?

17 MR. INGRAM: Yes.

18 A. I don't have a specific recollection of
19 one that we didn't use it, but there may have
20 been a time we didn't use one.

21 Q. Okay.

22 A. In most instances we used a facilitator,
23 not always the same one.

24 Q. And with respect to the retreats where

1 you would have used a facilitator --

2 A. Yes.

3 Q. -- would you have expected the
4 facilitator to provide a written summary of that
5 particular retreat, like we have here in Exhibit
6 27?

7 A. Yes. I'm not sure if there are any
8 instances where we didn't require that, but in
9 most instances I believe we relied on a
10 facilitator to give some summary. And I can
11 think of four different facilitators we used
12 over the course of time.

13 Q. And who are they?

14 A. Jane Dockery, who at the time worked at
15 Wright State. Marty Jenkins, who is
16 Organizational Resources Group, which he helped
17 develop the council expectations document that's
18 on the back pages of Exhibit 27. Management
19 Partners. Julia Novak from now Raftelis Novak
20 Consulting. And Herb Marlowe, a company called
21 Analytica. So that's more than four. That's
22 five.

23 Q. Very good memory.

24 And who would these facilitators provide

1 their retreat summaries to? would that be to
2 you in each instance?

3 A. I believe so.

4 Q. And with respect to the items that are
5 discussed at the City Council's retreats, who
6 selects what's going to be discussed at the
7 retreat?

8 A. That's a good question. They usually
9 emerge from a set of interviews that the
10 facilitator conducts, and then it's not always
11 issues, it's -- well, as you can tell here, we
12 framed it -- I don't have the agenda for this,
13 but there would be an accompanying agenda
14 probably, and it would have been -- it would
15 have -- we would have framed an agenda rooted in
16 the kind of themes that were heard from the
17 facilitator's interview of the participants, and
18 identified the things that needed to be focused
19 on in broad categories and that would have
20 formed kind of the steps of the -- of the
21 process.

22 Q. Okay. So if I'm following you, the --

23 A. It would have been generally myself, the
24 facilitator, and the council president who would

1 have talked about how the weekend was going to
2 go.

3 Q. So the facilitator would have
4 interviewed members of council, like each of the
5 members?

6 A. Yes.

7 Q. And would have --

8 A. Maybe not in every instance, but in most
9 instances.

10 Q. And would have been working with you and
11 any other city staff to identify what issues
12 were of interest or to be discussed at the -- at
13 that particular retreat?

14 A. Yes. And not always specific issues,
15 but themes that were coming out of it, like we
16 need to talk about council/staff relations, or
17 we need to talk about, you know, sustainability,
18 or what are the topics that we need to focus on.

19 Q. And would that written agenda be shared
20 with the meeting participants before the
21 retreat?

22 A. I think so, but I can't specifically
23 recall.

24 Q. Would it have been -- would it be posted

1 publicly anywhere?

2 A. I don't believe so.

3 Q. And then where were these retreats
4 typically held? Is there like one spot each
5 year?

6 A. No. Often -- often the WEC. We've held
7 them at different places over the years. Always
8 in the City of Worthington.

9 Q. Okay.

10 A. Yeah. We've held them at the community
11 center. We've held them at the educational
12 center. We've held at least one at Linworth
13 Experiential School, and one at the Griswold
14 Senior Center. So different places, but always
15 in a public facility and an accessible facility.
16 Always properly advertised and meeting the
17 requirements of Ohio law for public meetings.

18 Q. Now, with respect to the 2018 retreat,
19 based on Management Partners' summary in Exhibit
20 27, the UMCH site was discussed at that retreat.
21 Do you see that at the bottom of page 3?

22 A. Yes.

23 Q. I know you just skimmed Exhibit 27. I'm
24 going to give you a chance here to read a

1 portion here that concerns the UMCH site,
2 please.

3 A. Okay. I've read it.

4 Q. Now that you've read that, do you recall
5 this particular retreat?

6 A. I recall the retreat. I can't recall
7 the specific discussion that led to these -- the
8 detailed specifics of what led to these bullets
9 being placed on this page, page 3 here.

10 Q. Sure. And there's a -- the bullets
11 you're referencing indicate that they are the
12 desired uses for this site. Do you see that?

13 MR. SCHUMACHER: Objection. That's not
14 what it says. It says, what are the desired
15 uses for the site?

16 MR. INGRAM: And then the bullets list
17 it.

18 MR. SCHUMACHER: Please don't misquote
19 the document.

20 MR. INGRAM: I wasn't quoting it,
21 counsel.

22 MR. SCHUMACHER: It sounded like you
23 were. That's my objection.

24 what's the question, Rhonda?

1 (Record read as requested.)

2 MR. SCHUMACHER: Same objection.

3 A. Yeah. So I'm not sure what the question
4 is. This isn't a policy document. It's a
5 reflection of the conversation that occurred,
6 and so it's not law, it's not engrained in
7 plans. It's a reflection of the conversation
8 that occurred and a summary of that related to
9 the children's home site.

10 Q. Okay. Well, as set forth in Exhibit 27,
11 on page 3 of the memorandum, the summary of the
12 conversation at that annual retreat, this
13 document says that, what are the desired uses
14 for the site? Attract commercial/mixed-use
15 along High Street, develop park amenity/green
16 space and tree buffer, protect the Tucker Creek
17 area, and then prepare the density analyses
18 scenarios.

19 A. Yes.

20 Q. So with respect to the discussion at
21 City Council's retreat concerning the desired
22 uses for this site, were these the city
23 councilmembers' desired uses? In other words --

24 MR. SCHUMACHER: Objection. Were you

1 finished? I'm sorry. Had you finished the
2 question?

3 Q. Who was -- whose input is this
4 summarizing?

5 MR. SCHUMACHER: Objection. Compound
6 question. I assume you wanted him to answer the
7 last question?

8 A. You want to know whose input this is
9 capturing, right?

10 Q. Correct.

11 A. I think this is capturing the dialogue
12 at the meeting and the discussion. In fact, it
13 says, for each topic, discussion points have
14 been captured and that, you know, these were
15 the -- you know, the things of what I would call
16 major points of consideration.

17 Q. Okay. And the portion where you just
18 referenced the input or discussion that was
19 captured was from the workshop involving city
20 councilmembers along with the city manager and
21 the leadership team? Is that what you're
22 referring to?

23 A. Again, I don't know -- I don't recall
24 who was specifically in the room beyond the

1 council and myself at the time. But yeah, that
2 would -- there would have been a discussion.
3 whether it reflected consensus or not, I don't
4 remember.

5 Q. As far as what was summarized here in
6 this memorandum, I'm just trying to understand,
7 is it summarizing City Council's views, is it
8 summarizing your views, the city leadership
9 teams, or was it the combination of all three?

10 MR. SCHUMACHER: Objection.

11 A. I think it summarizes the discussion and
12 what is important to work on and acknowledges
13 that these are the key aspects of the issue with
14 the United Methodist Children's Home site. You
15 articulated correctly, I think, the people that
16 were in leadership, to some extent, me and
17 others, council. I don't remember what
18 directors. And whether it -- when you say
19 reflects our views, I can't at this juncture
20 remember whether this -- this accurately
21 captures the views of everybody that was in that
22 room. I know that we use these as documents to
23 kind of guide work, not necessarily -- they
24 don't necessarily decide issues or cement

1 permanently the position of the city, if that
2 makes any sense.

3 Q. Okay. And so when you received this
4 memorandum, did you identify any inaccuracies in
5 the summary that was provided; in other words,
6 to the extent the discussion concerning the UMCH
7 site was inaccurate, did you contact Management
8 Partners and tell them to fix it?

9 MR. SCHUMACHER: Objection.

10 A. If this is the final document, then I --
11 then I didn't. I'm not -- I'm not aware that I
12 did.

13 Q. Are you aware of any revisions or
14 additional drafts of this document?

15 A. I don't recall. I don't remember other
16 drafts or whether I suggested modifications to
17 it based on, you know, my -- you know, my
18 hearing a different -- a different thing at the
19 meeting, or they misunderstood the issue that
20 was being discussed. I generally wanted to
21 always make sure that it accurately reflected
22 the conversation and, you know, that they
23 understood the issue being discussed.

24 Q. If there were other drafts or revisions

1 to this document, would you expect those to be
2 in writing?

3 A. I would expect them to be probably in
4 emails transmitted to the city manager's office
5 in some form or fashion.

6 Q. So we would have those if they existed?

7 A. You would.

8 Q. All right. Staying on that page,
9 there's a bullet point there for the UMCH site,
10 what is the potential for revenue generation?
11 what portion of the discussion is that
12 summarizing, as far as revenue generation? what
13 does that mean?

14 A. I would need to look at the timeline for
15 this whole issue. But there was concern at
16 different times. It could mean a bunch of
17 things. Let me talk a little bit about -- so
18 we're -- you know, it's important that there be
19 a balanced -- and I've used that term before --
20 set of uses on properties, any property, but
21 particularly large-scale properties of critical
22 importance in content sensitivity like UMCH so
23 that, you know, uses don't impact, you know --
24 the uses are additive economically and otherwise

1 to the quality of life of the community. And
2 one of the things we were always concerned about
3 is job growth, office. You know, I think the
4 comprehensive plan as well as our record says
5 it's really important to -- this is an
6 opportunity to have jobs to produce income tax
7 revenue. And then anything else, park space,
8 housing, there had to be a balance of those
9 across the site. So it was economically
10 additive to our community.

11 We were also worried about the cost of
12 serving the -- any developments in the
13 community. And so, you know, we were starting
14 to wrestle with -- and I can't remember the
15 specific timelines and when it all occurred.
16 But during this process, we were starting to
17 wrestle with what might different scenarios cost
18 the city to serve, police, fire, water lines,
19 sewer maintenance, all of the various ways,
20 trash pickup. And so there's some potential
21 that we were talking not only about the economic
22 income tax generation, but also thinking about
23 how that revenue generation offset the impacts
24 of service.

1 Q. Okay. And with respect to these
2 scenarios that you're referring to, there's also
3 listed here the prepared density analyses
4 scenarios. Is that what you were referring to,
5 or you're referring to something different?

6 A. I don't know what we were specifically
7 referring to in this bullet. I don't recall.

8 Q. Okay. Did you or are you aware of any
9 density analysis performed concerning the UMCH
10 site after this annual retreat?

11 A. Again, I don't recall the timing of all
12 of these things, which came first and second.
13 But we did a detailed cost-to-serve analysis of
14 various development scenarios, and you probably
15 have that.

16 Q. I'm sorry, what did you call that again?

17 A. We did a detailed cost-to-serve
18 analysis, which contemplated different
19 development scenarios or -- and what the
20 corresponding costs associated with providing
21 public -- what the potential revenue generation
22 was as well as the cost to serve, deliver city
23 services.

24 Again, we need -- you know, when -- good

1 city managers and financial people and planners
2 and city governments want to make sure that
3 we're -- that we have balance and that we -- and
4 this particular site so critically important, we
5 needed to have a sufficient revenue-producing
6 development to offset the cost to serve any
7 other type of development that might not be
8 revenue producing and demand services.

9 And so housing, for instance, in Ohio,
10 because of our tax structure, demands services.
11 The required trash pickup, city pays all of
12 that. Some kinds of housing do. Waterline
13 extensions, you know, street maintenance, all of
14 those kind of things, most forms of housing
15 demand have a cost. They don't add to the -- in
16 the positive way to the revenue stream. Office,
17 industrial, commercial tends to add to the
18 revenue stream creating dollars the city can use
19 to provide services and amenities.

20 So we were starting to think through
21 those use scenarios on that site, wrote a
22 cost-to-serve analysis, playing the staff's role
23 of informing public dialogue. Again, not trying
24 to direct a particular outcome, not trying to

1 drive towards, as a staff, you know, some --
2 some desired policy outcome, but trying to
3 inform what had become a very fractious
4 community conversation about a critical
5 property.

6 Q. Okay. With respect to the analysis that
7 was performed, are you testifying that the city
8 had performed a cost-to-serve analysis for all
9 residential housing on the UMCH site?

10 A. I'm not --

11 MR. SCHUMACHER: Objection.

12 A. Clarify that for me.

13 THE WITNESS: I'm sorry. I interrupted
14 you.

15 MR. SCHUMACHER: That's all right. I'm
16 going to get a document.

17 BY MR. INGRAM:

18 Q. You mentioned that most residential uses
19 are -- tend to cost more than the revenue that's
20 generated.

21 A. Yeah, as a general rule of thumb.

22 Q. But that's not -- so your testimony --
23 or your last response is based on a general rule
24 of thumb, not on any particular analysis?

1 A. I think you can look at analyses that
2 have been done by other communities that are
3 like Worthington where they hired companies that
4 do these significant detailed analyses, and
5 those reports would show you that those
6 communities, similar to Worthington, that
7 housing -- because Ohio municipalities are
8 dependent on income taxes -- and income taxes,
9 until the work from home era and still, are
10 largely derived from offices, manufacturing
11 sites, and other commercial activity, that that
12 land use is what supports the city's budget and
13 ability to provide services and amenities and
14 quality of life to its residents. And
15 therefore, you know, we were seeking generally
16 to strike a balance in the community and on this
17 site between things that demanded -- potentially
18 demanded services versus revenue-producing
19 activity.

20 Q. So my question is a little different.

21 A. I'm sorry.

22 Q. That's okay. I'm just trying to
23 understand, the explanation you just provided,
24 was this explanation based on any specific

1 analysis that the city performed, or are you
2 responding based on the generalizations or rules
3 of thumb from your experience?

4 A. Both. I'm responding -- probably my
5 long-winded last answer, humbly, was based on my
6 general rule of thumb and my reading of similar
7 studies that have been done for other
8 communities regarding which land uses generate,
9 you know, what impacts they generate.

10 we also performed a cost-to-serve
11 analysis using some number of scenarios for
12 UMCH. And I can't quote that one specifically,
13 but I know we did it based on several scenarios
14 for that property's development.

15 Q. Okay. And with respect to the UMCH
16 site, did the city ever perform an analysis of
17 any density of apartments or multifamily --
18 multifamily units on that site?

19 A. I think the cost-to-serve analysis that
20 was conducted by the city includes at least one
21 scenario that has residential density comparable
22 to Lifestyle's 2015 proposal, or concept plan
23 they presented in the community or at the WEC.
24 And you can look at the cost-to-serve analysis

1 to verify that and further clarify it; but...

2 Q. Were there any -- and you're getting to
3 my next question. I'm trying to understand,
4 were there any other analyses beyond this
5 cost-to-serve analysis that you're discussing?

6 A. Not that I specifically recall. And if
7 there were, that were done by the city, it would
8 have been, you know, internal back of napkin,
9 you know, kind of local government nerds
10 imagining different things.

11 we did not commission, that I remember,
12 or conduct any more extensive evaluation
13 directed by the council or by me.

14 Q. Okay.

15 A. I'm aware there's some other scenarios
16 that members of the community conducted that we
17 didn't participate in, although some of our
18 information may have been used.

19 Q. Okay. And what are you referring to
20 there, from the members of the community aspect?

21 A. Well, at some point there was a group,
22 Project Community Park, that produced a document
23 that, from their perspective, evaluated a park
24 acquisition and development scenario on that

1 site. I did not, nor did any of my staff,
2 participate in that. Although I think they
3 attempted to rely on information that we had
4 previously provided to the public.

5 Q. And do you recall any other scenarios
6 from the community? I'm sorry, analyses.

7 A. There is a lot of records over the time,
8 over what -- what is this going on, since --
9 since 2007 for me almost. There may be some,
10 but I just can't specifically recall.

11 Q. All right. Just briefly, I wanted to
12 ask you about appendix 3 to Exhibit 27, council
13 expectations.

14 A. Sure.

15 Q. You referred to these a few moments ago.
16 Were these council expectations? What are they?
17 Were they adopted by council?

18 A. Yeah. I think they were adopted by
19 council. Accepted by council might be the
20 better word. And that would be in the record at
21 some point if they voted on them. But they were
22 an effort to try to set a -- they're not rules.
23 In other words, they're not -- but they're kind
24 of aspirations for how we were going to work

1 together.

2 Q. Okay.

3 A. And something to refer to to guide our
4 own behaviors as we interact in what sometimes
5 can be a difficult environment reconciling
6 different opinions about the future of a great
7 community.

8 Q. And these expectations, I can see here,
9 have been around since 2008, it looks like, at
10 least?

11 A. Yeah. Periodically modified and looked
12 at every time we had a retreat.

13 Q. What rules govern City Council meetings?

14 MR. SCHUMACHER: Objection.

15 You can answer.

16 A. The charter, the codified ordinances,
17 and the council had some adopted rules of
18 procedure, if you will. I don't remember what
19 we called them. And Ohio law, of course.

20 MR. INGRAM: Mr. Greeson, that's all the
21 questions I have for that document.

22 MR. SCHUMACHER: Oh. I thought you put
23 a period there.

24 MR. INGRAM: It's about 12:25. I don't

1 know if you're hungry, if you want to break for
2 lunch, or you want to keep going. It's
3 completely up to you.

4 THE WITNESS: well, how long are we
5 going?

6 MR. INGRAM: We're going to go the full
7 day today. I know I talked to your counsel --
8 or to Mr. Schumacher yesterday and indicated
9 that we probably would go until 5:00 today.

10 THE WITNESS: Okay.

11 MR. INGRAM: I can continue forward, or
12 we can take a break. Is there anything you have
13 today that prevents you from staying till 5:00?

14 THE WITNESS: No, nothing prevents me
15 from staying till 5:00. And if we're going to
16 do that, then I think a break is in order
17 because I may need some sustenance.

18 MR. INGRAM: Yes. Let's take a break
19 for lunch.

20 ==O==

21 Thereupon, the luncheon recess was taken
22 at 12:26 p.m.

23 ==O==

24

1 OCTOBER 6, 2023

2 FRIDAY AFTERNOON SESSION

3 1:20 P.M.

4 --O--

5 BY MR. INGRAM:

6 Q. Mr. Greeson, we're back on the record
7 after lunch.

8 I wanted to ask you, earlier we had
9 talked about any efforts by the city to acquire
10 or purchase a portion of the UMCH property, and
11 we were talking about that in the time frame
12 around 2015. Do you recall that?

13 A. I recall our conversation this morning,
14 yes.

15 Q. Now, later, more recently, are you aware
16 of any efforts or discussions of the city
17 considering purchasing any portion of the UMCH
18 property? And for a time frame, I'm thinking
19 from 2018 to 2022.

20 A. Before I left?

21 Q. Correct.

22 A. 2018 to 2022. I think there was -- I'm
23 having a difficult time remembering
24 specifically.

1 MR. SCHUMACHER: Chris, I assume you're
2 talking about other than any negotiations
3 between the parties --

4 MR. INGRAM: Of course.

5 MR. SCHUMACHER: -- in the litigation.

6 MR. INGRAM: Yes.

7 MR. SCHUMACHER: Thank you.

8 A. I didn't -- I didn't engage in any
9 dialogue with Lifestyle regarding acquisition,
10 nor did we hire anybody to initiate acquisition,
11 nor do I believe there was any consensus of
12 council to aggressively pursue or actively
13 pursue acquisition. I know there were some
14 outreach to Lifestyle sometime in early 2022 by
15 Mr. Robinson, that I'm aware of, but I don't
16 recall any specific details of that.

17 Q. Okay. What are you aware of as far as
18 the instance of Mr. Robinson reaching out to
19 Lifestyle in 2022?

20 A. I was aware of it. I was aware he
21 reached out to Bo Brownlee. I just don't
22 remember the details of it. I've had a lot of
23 transition in my life since then.

24 Q. Were you a party to the conversation

1 that you're referring to between Mr. Robinson
2 and Mr. Brownlee?

3 A. I wasn't a party to any direct
4 conversations between the two of them that I can
5 remember, and -- but I would have probably
6 talked to Mr. Robinson afterwards or beforehand,
7 but I don't have -- I don't have a recollection
8 of the details of -- my family moved jobs, moved
9 a lot.

10 Q. Sure. With respect to purchase or
11 acquisition of Lifestyle's property or the UMCH
12 property during the time frame -- during this
13 time frame now, were you asked to perform any
14 analyses or, I guess, for lack of a better term,
15 due diligence before one would reach out to the
16 landowner?

17 MR. SCHUMACHER: Excuse me. I'm sorry.
18 What time frame?

19 MR. INGRAM: 2018 to '22.

20 MR. SCHUMACHER: 2018 to '22?

21 MR. INGRAM: Yeah. That's the time
22 frame these questions pertain to.

23 MR. SCHUMACHER: Thank you.

24 A. So I don't remember what the -- when the

1 cost-to-serve analysis was, but that was not due
2 diligence related to acquisition. That was
3 evaluating, informing the public dialogue. It
4 was a public document. It was informing the
5 range of options that would be available to the
6 city in terms of just good planning kind of
7 exercise. I don't think so. I don't have a
8 memory in that particular time period of any,
9 you know, intense analysis regarding
10 acquisition. Nor do I think we had a lot of
11 clarity, any clarity, that we would pursue
12 acquisition. So anything -- we may have, like,
13 what I would call back of napkin, you know, hey,
14 let's run some numbers, you know, kind of
15 curiosity type of things, we may have done as
16 staff. I don't remember specifically.

17 But we didn't launch a diligent effort
18 to -- based on specific policy direction, to try
19 to acquire the property. I mean, you know,
20 that's -- you know, I could give you examples of
21 where we did do that, and we didn't do the kind
22 of work that -- you know, appraisals and talking
23 to the owner and hiring real estate advisors and
24 all of that kind of work. I was wrestling with

1 this because I was trying to remember if there
2 was any kind of staff back of the napkin kind of
3 imagining things kind of effort. So I'm having
4 a hard time recalling it.

5 Q. Okay. You mentioned that you or staff
6 weren't given any clarity. So were there
7 discussions by individual members of council
8 regarding the potential purchase or acquisition
9 of any portion of the UMCH during this time
10 frame?

11 A. I can't speak to the specific time
12 frame, but at different junctures over the
13 course of time -- and I can't speak to exactly
14 when -- basically when I thought the property
15 might be in play or, you know, where the
16 strategic -- you know, when something was
17 happening, I raised with council in executive
18 session, you know, things look like they're
19 changing over there. Is there any interest in
20 us doing anything? And there's never any
21 consensus. You know, there was no city-adopted
22 strategy around acquisition over there.

23 Q. So did you feel like you were being told
24 to do different things, if there's no consensus?

1 MR. SCHUMACHER: Objection.

2 Q. I'm trying to understand what you're
3 saying.

4 MR. SCHUMACHER: Objection. Asked and
5 answered. Do you want him to tell you again?

6 A. Can you repeat, please?

7 (Record read as requested.)

8 A. No lack of -- lack of -- so, you know,
9 city manager takes his or her direction from the
10 council majority, and so what we look for is the
11 majority of council saying we want to move in a
12 particular way. And so when you don't have
13 that, you don't move forward. Or you play the
14 inform, facilitate, provide information, do
15 research kind of role so that you can help the
16 council make informed policy decisions, but you
17 don't move forward.

18 So during the course of this, while
19 there may have been individual members that
20 thought we should acquire or that we should do
21 different things, there was no time in which I
22 was -- majority of council directed me to pursue
23 a strategy that involved that.

24 Q. So during this --

1 A. You know, a serious robust effort.

2 Q. Okay. So during this 2018-2022 time
3 frame, were there individual members of City
4 Council who were interested in the city seeking
5 to acquire or purchase a portion of the UMCH
6 site?

7 MR. SCHUMACHER: Objection. Relevance.
8 Go ahead. You can answer.

9 A. Yes. And I think those are a matter of
10 public record, because I don't think anybody
11 shared with me any insights that they didn't
12 also voice publicly. Mr. Robinson would have
13 been the best example of one who thought that
14 that was a strategic direction that we should
15 consider and felt very strongly that our
16 comprehensive plan was not the right -- didn't
17 reflect the right strategic direction. And
18 there was obviously a lot of people in the
19 community that had strong feelings about the
20 uses that were outlined in the -- in the plan.
21 But, you know, he and probably Mr. Smith -- you
22 know, I can't remember all the election cycles.
23 But yeah, there were some councilmembers that,
24 you know, talked about that, both publicly

1 and --

2 Q. How about privately?

3 A. Privately, but I can't remember a
4 specific conversation. I mean, I can't go back
5 and say that they thought that that would be a
6 good strategic direction, but it never reflected
7 a majority of the council, you know, that we
8 acted upon --

9 Q. So you --

10 A. -- that I recall.

11 Q. Okay. So you've identified Councilman
12 Robinson and Councilman Smith. Any other
13 councilmembers you recall at this time?

14 MR. SCHUMACHER: Are we still talking
15 about 2018 to '22?

16 MR. INGRAM: Yes.

17 A. I'm trying to think who was on council.
18 Councilmember Bucher was on during that time. I
19 don't feel comfortable speaking to the totality
20 of his position on this issue. I didn't have a
21 ton of conversations with him about it.

22 Q. Okay.

23 A. And I'm not going to characterize their
24 positions because certainly this was a -- this

1 is an issue that evolved over a long period of
2 time with a lot of public input and a lot of --
3 a lot of, you know, emotional and intense public
4 engagement. And I think they should reflect
5 their policy thoughts on it, not me. Bottom
6 line is I don't have a specific memory, unless
7 you jog my memory with some document --

8 Q. Okay.

9 A. -- about --

10 MR. SCHUMACHER: Don't encourage him.

11 THE WITNESS: I know.

12 Q. Mr. Greeson, as the city manager, you
13 had lots of public and private interactions with
14 members of City Council. What about
15 Ms. Kowalczyk?

16 MR. SCHUMACHER: Objection. Compound.
17 Which question?

18 A. I did have interaction with
19 Ms. Kowalczyk. I don't have a specific memory
20 of a specific interaction with her.

21 Q. Concerning the acquisition of the UMCH
22 site?

23 A. Not specific. Doesn't mean I didn't
24 have them.

1 Q. You don't recall one way or the other,
2 in other words?

3 A. Yeah.

4 THE WITNESS: He's doing it.

5 MR. SCHUMACHER: Told you not to
6 encourage him.

7 THE WITNESS: Yeah.

8 --0--

9 (Deposition Exhibit 28 marked.)

10 --0--

11 BY MR. INGRAM:

12 Q. Handing you what's been marked as
13 Exhibit 28, Mr. Greeson.

14 Mr. Greeson, Exhibit 28 --

15 A. Bear with me one second here.

16 MR. SCHUMACHER: He's still reading.

17 A. Okay.

18 Q. Now that you've had an opportunity to
19 review this email, Exhibit 28 is an email from
20 you to Councilperson Kowalczyk,
21 K-O-W-A-L-C-Z-Y-K, dated February 28, 2018. And
22 is Bates stamped Worthington 58435 through
23 58463. Do you see that?

24 A. Yes.

1 Q. Is this an email that you sent
2 Councilperson Kowalczyk? Do you recognize this
3 email?

4 A. I don't recall it, but I recognize it as
5 an email I wrote. Certainly reflects that.

6 Q. And Exhibit 28, based on your email
7 here, concerns follow-up to a conversation you
8 had with Ms. Kowalczyk related to the UMCH
9 property; is that fair?

10 A. Yes, it certainly reflects that.

11 Q. And you provided her with what you said
12 were helpful documents as attachments to this
13 email; is that fair?

14 A. Yes. Looks like she might have been
15 preparing for something. And I provided
16 information -- obviously, I told her that we had
17 a ton of information available, but looks like I
18 provided her four things that I thought she
19 would benefit from reading.

20 Q. I want to direct your attention to the
21 last paragraph of your email here on Exhibit 28
22 where you say, these are some thoughts on the
23 fund balance, which is the question you raised.
24 As far as strategies for ensuring green space,

1 there is a simple overview of three approaches
2 to this in the attached draft framework
3 document.

4 Do you see that?

5 A. Yes, I do see that.

6 Q. Do you recall now the discussion you had
7 with Councilperson Kowalczyk?

8 A. I still don't recall it.

9 Q. Okay. And if you could turn to the
10 draft framework document you're referencing.
11 where are the three approaches you're referring
12 her to in that framework document?

13 A. I wrote the framework document; however,
14 I would have to re-read it to answer your
15 question.

16 Q. All right.

17 A. Because it appears I wrote it in 2016.

18 Q. Okay. Fair enough. How about this,
19 let's start with -- so you drafted the framework
20 document?

21 A. Yes.

22 Q. Okay. Starting at Bates page number
23 58457 of Exhibit 28. Did anyone assist you in
24 drafting this framework document?

1 A. I don't recall specifically. It would
2 be a normal practice of mine to have some other
3 staff review my, you know, work, just to make
4 sure it makes sense, but I don't have a memory
5 of who might have done that or whether they did
6 it or not.

7 Q. Okay.

8 A. Whether that was done, I should say,
9 with better grammar.

10 Q. Well, the fact that this document was
11 created in 2016, but you're attaching it to a
12 2018 email, would this be likely the last
13 version of -- or last draft, I should say, as
14 of -- you know, for that document?

15 A. I don't know the answer to that. I
16 remember working on it. I don't believe I
17 picked it up after I completed it --

18 Q. Okay.

19 A. -- and re-did it some years later. It
20 kind of rested.

21 Q. Did anyone ask you to prepare this
22 framework for moving forward?

23 A. Yeah. So this -- again, I talked
24 earlier -- I talked earlier about the manager's

1 role in informing and facilitating, providing
2 information and framing policy options for not
3 only the council but the community. This
4 document came out of dialogue with community
5 groups and council leadership where we were
6 getting a lot of questions. And so we were
7 being asked questions about, you know, city
8 finances and our fiscal capacity to do things,
9 always recurring conversation in Worthington,
10 and about, you know, what the strategic paths --
11 what might be different strategic paths for
12 UMCH. And this -- in fact, I think you asked me
13 some questions about some of the meetings that
14 we held with community groups earlier in the
15 day. This came out of that dialogue and was an
16 attempt by me to kind of inform the discussion
17 that people were having. It was not -- it was
18 not aimed at trying to drive a particular
19 outcome, but to help educate people on how
20 cities might approach different things,
21 different options, and some of the
22 considerations of each of those options.

23 Q. Okay. When you were preparing or
24 creating this framework, did you consult with

1 UMCH about it?

2 A. I don't think I did. No, I don't
3 believe I did.

4 Q. And when you were preparing this
5 framework, did you consult with Lifestyles about
6 it?

7 A. No. I believe I consulted myself. But
8 I certainly viewed this as a public document,
9 not as something that was aimed at anything but
10 informing my council and the public dialogue.
11 And in 2016, and probably all the way to 2018
12 and beyond, you know, Lifestyles had no
13 significant proposal. The last time we had
14 heard from them on any large scale proposal was
15 in -- I believe that was 2015. And so the
16 community was left -- other than the OhioHealth
17 and the smaller subdivision question, the
18 community was left to wonder what was going to
19 be the future of the larger UMCH property, and
20 certainly policy dialogue about that is
21 appropriate.

22 Q. Okay. But in connection with, in 2016,
23 determining what was to become of the property,
24 you didn't consult either UMCH or Lifestyles?

1 A. Repeat the question again.

2 MR. INGRAM: Read it back, please.

3 (Record read as requested.)

4 A. Well, first of all, I wasn't determining
5 what was happening with the property.

6 Q. My question is a little different.

7 MR. SCHUMACHER: Let him finish his
8 answer.

9 A. Well, I actually want to hear the
10 question again, then, because --

11 Q. Well, you just previously said that the
12 community was wondering what was going on with
13 the property?

14 A. Right.

15 Q. In other words, what they're going to do
16 with it, they being either Lifestyle or UMCH,
17 right?

18 A. Yes.

19 Q. And so you're preparing this framework
20 in response or in connection with the community
21 dialogue that you just described, right?

22 A. Right.

23 Q. But you never consulted with or talked
24 to either UMCH or Lifestyles about what they

1 intended to do with the property?

2 A. I don't recall consulting them
3 specifically about drafting this. In reviewing
4 it, I clearly had some knowledge about what they
5 were doing, because I reflect that in the
6 paragraph, and there's a discussion about
7 OhioHealth in here. So I may have had some
8 knowledge of what they were doing that I
9 reflected and shared, and I did that in the
10 background section, but I didn't -- I didn't --
11 I didn't engage them in writing what I thought
12 were options available to the city. I
13 imagine -- I'd have to review all that, but I
14 suspect that I caveated everything in here, and
15 nor would I normally. I wouldn't normally
16 consult a developer to outline what all our
17 policy options are as a city.

18 Q. Okay.

19 --0--

20 (Deposition Exhibit 29 marked.)

21 --0--

22 BY MR. INGRAM:

23 Q. I'm going to hand you what's been marked
24 as Exhibit 29. Exhibit 29 is an email from you

1 to Councilmembers Michael and Myers, dated March
2 19, 2018, and it's Bates numbered Worthington
3 57946 through 57948. Do you see that,
4 Mr. Greeson?

5 A. I do.

6 Q. And the subject of your email on Exhibit
7 29 is, retreat follow-up: UMCH info. Do you
8 recognize that?

9 A. Yes.

10 Q. And you were forwarding an email chain
11 between you and newly elected Councilmember
12 Robinson, correct?

13 A. That appears to be the case, yes.

14 Q. So if we turn to Mr. Robinson's email to
15 you, dated February 19, 2018, in which he CC'd
16 other members of council, it appears that
17 Mr. Robinson had requested an analysis from you;
18 is that fair?

19 A. Yes. In reading this, that appears to
20 be the case.

21 Q. Do you recall this circumstance?

22 A. I don't recall this specific email and
23 my forwarding of it. Again, that's now five
24 years ago, if I have my timing right. However,

1 the output that I talked about earlier, the cost
2 to serve, that's the output of this
3 conversation.

4 Q. Okay.

5 A. So, you know, you focused on the treat
6 notes earlier today, and there had been dialogue
7 occurring about what are the -- what's the true
8 cost and what are the different public impacts
9 of different development scenarios at the site.
10 And so I was wrestling with whether -- I'll be
11 honest with you, that's good government work to
12 analyze potential development outcomes and the
13 impact on fiscal health and, you know, traffic
14 and cost to serve. But we were wrestling with
15 whether the staff had time to do that work and
16 whether the council leadership or the majority
17 of council wanted us to provide that work.

18 I ultimately concluded that we needed to
19 do it, it would be beneficial for the overall
20 dialogue the community was having and that the
21 council was having, and we produced the
22 cost-to-serve analysis.

23 Q. So this is Mr. Robinson following up
24 from that retreat that we discussed earlier?

1 A. Again, I don't recall the specific
2 emails and the sequencing of it all, but, you
3 know, we're clearly being asked to provide
4 information, and like good staff members we
5 produced a document that may not have answered
6 many of his specific questions, but we thought,
7 based on information that we could, you know,
8 readily obtain, that analyzed different
9 development scenarios and the costs to serve
10 them.

11 Q. Mr. Robinson followed up with you
12 exactly a month later, and you forwarded
13 Mr. Robinson's response only to Ms. Michael and
14 Mr. Myers. Why's that?

15 A. At the time I believe they were council
16 president and president pro tem, the leadership
17 of the council.

18 Q. Okay. And --

19 A. And I don't recall when we specifically
20 completed the cost to serve. It took a while.
21 And we did it as we could fit it into the staff
22 time available.

23 Q. Okay. And what did you tell President
24 Michael or Pro Tem Myers?

1 A. I don't specifically remember the
2 conversation.

3 Q. Was anybody else party to that
4 conversation?

5 A. I don't know.

6 --0--

7 (Deposition Exhibit 30 marked.)

8 --0--

9 MR. SCHUMACHER: You brought a wheeled
10 cart, right? I can help you later, if it's too
11 much to carry.

12 Did you ever take a deposition in New
13 York City?

14 MR. INGRAM: Yes.

15 MR. SCHUMACHER: The court reporters,
16 they won't carry the exhibits. And they stop at
17 5:00, because they got to get the train.

18 This is 30.

19 BY MR. INGRAM:

20 Q. And for the record, Mr. Greeson, you've
21 been handed what's been marked Exhibit 30 --

22 A. Yes.

23 Q. -- which is an email from you to Martin
24 Jenkins --

1 A. Yes.

2 Q. -- dated March 9, 2020, Bates numbered
3 Worthington 58301 through 58367. Do you see
4 that?

5 A. Yes.

6 Q. Earlier I think you mentioned that
7 Martin Jenkins was one of the facilitators for
8 council annual retreats?

9 A. Yeah. He periodically did council
10 retreat facilitation. I'm not sure -- I can't
11 tell you every year he did one, but this would
12 have been -- yes.

13 Q. The subject of your email is UMCH
14 background staff. Is that background stuff?

15 A. Yeah, I'm not -- yes, it probably would
16 be stuff.

17 Q. There were reports that Dr. Herb
18 Marlowe --

19 A. Yes.

20 Q. -- prepared in 2018, early 2019. There
21 are drafts of those -- or a draft of the report,
22 and just at a very high level, what were those
23 reports?

24 A. Dr. Marlowe is a consultant from Florida

1 who is experienced in public dispute resolution,
2 visioning strategic planning, helping cities and
3 counties navigate challenging public processes
4 where there's discord and community controversy.
5 And I reached out to him to get some insight
6 from him on could there be some kind of public
7 process that we could employ that would help --
8 I want him to assess the very challenging
9 environment we were in with many different
10 opinions about the strategic direction of the
11 property, and, you know, recognizing that it
12 was, again, highly context sensitive, critical
13 to the future of our community, and had a lot of
14 strongly held beliefs in the community. I
15 wanted somebody that was objective to the
16 situation that was a skilled public process
17 architect, if you will, and facilitator to
18 assess the situation and identify whether he
19 thought there were any processes that could be
20 followed to help resolve the issues to the
21 benefit of the stakeholders involved. well, to
22 resolve the situation in a productive fashion.
23 So that's the work we hired him to do, and
24 you're seeing some of the by-product of that.

1 Q. Okay. And when you're referencing this
2 situation, you're referring to the development
3 of the UMCH site?

4 A. Yes. And again, I'm in my city manager
5 role. I'm trying to facilitate. I'm, you know,
6 trying to shape strategic policy options to be
7 considered to move forward on a critically
8 important property.

9 Q. And ultimately -- well, it says that --
10 your email says that we chose to move forward
11 with a community visioning process that
12 Dr. Marlowe had recommended, fair?

13 A. My email does say that, I believe, yes.

14 Q. Okay. What was Dr. Marlowe's community
15 visioning process? What did he recommend?

16 A. I would have to re-read this report,
17 which is -- you handed me, which is about a half
18 inch thick, in order to answer that question in
19 detail.

20 Q. And I'm not asking --

21 A. But essentially, we launched vision
22 Worthington as a result of that, which was a
23 community visioning process that a different
24 consultant facilitated.

1 Q. So the Visioning Worthington process,
2 that's for the city at large, correct? That
3 doesn't pertain just to the UMCH site?

4 A. No, but I think -- no, it's not, but you
5 can't ignore that the UMCH property -- again, I
6 kept saying it's in the heart of the town, it's
7 right across from the City Hall, it's on High
8 Street, it's one of the largest undeveloped --
9 or developable properties, you know, very
10 important in their strongly held beliefs about
11 what the right strategic direction is for that
12 property. And while that process was for the
13 community at large, it certainly helps inform --
14 could help, to some degree, inform how the
15 community moves forward.

16 What Dr. Marlowe, I believe, was sensing
17 was that there were pretty different visions in
18 the community. There was a divide in the
19 community around what strategic direction we
20 were going to take. That tension, if you will,
21 exists throughout the community in terms of
22 growth and development of the city, and then it
23 also shows up related to this property because
24 it's so central to the community.

1 Q. Okay. So the UMCH property is almost a
2 microcosm, if you will, of that issue; is that
3 fair?

4 MR. SCHUMACHER: Objection.

5 A. I don't know if microcosm is the -- is
6 the right word. It is more acute, I think,
7 because the property is so important, right? So
8 it is, again, centrally located, across from
9 City Hall, it's got natural features, surrounded
10 by the neighborhood, yet on High Street, not too
11 far north of -- you know, kind of right between
12 our major centers at 270 and Old Worthington.
13 And so it is the most context sensitive and the
14 most strategic location, I think, in the city.
15 And it by itself is utterly important, but it's
16 also impacted by, you know, kind of a tension
17 that goes back to Worthington's creation of the
18 city between whether we're, you know,
19 maintaining the historic village character or we
20 become more like the Short North. I mean, that
21 kind of tension.

22 Q. Okay.

23 MR. SCHUMACHER: You said the Short
24 North?

1 THE WITNESS: Yeah. It's an area.

2 MR. INGRAM: It's down High Street,
3 counsel.

4 THE WITNESS: Yeah, more densely
5 developed.

6 BY MR. INGRAM:

7 Q. I want to direct your attention now to
8 the -- your memorandum that is attached and a
9 part of Exhibit 30. If the look in the lower
10 right-hand corner, it's towards the very back,
11 beginning at page 58364. To 64.

12 MR. SCHUMACHER: 58364.

13 A. Yes.

14 Q. And Mr. Greeson, attached to your -- you
15 attached a memorandum that you drafted dated
16 January 31st, 2020, the subject of your
17 memorandum was, responses to questions posed by
18 Councilmember Robinson regarding status of UMCH
19 comprehensive plan update. Do you see that?

20 A. Yes.

21 Q. For purposes of the record, did you
22 draft this memorandum?

23 A. Yes.

24 Q. Did anyone help you?

1 A. I don't believe anybody helped me,
2 although I believe it was likely reviewed by the
3 law director.

4 Q. Okay. And is that your signature there
5 on the first page of your memorandum?

6 A. Yes.

7 Q. The memo is directed to the members of
8 the City Council. With whom did you share this
9 memo, other than the law director and members of
10 the City Council?

11 A. I don't remember, but I imagine key
12 staff involved by Mr. Brown, probably
13 Ms. Steward, but I don't have a specific memory
14 of who received this. Let me see if there are
15 CCs on it. Or who helped -- you know, who
16 reviewed it before I sent it out. It may have
17 had more than just the law director's eyes on
18 it, just to make sure that I wrote coherently.

19 Q. And based on the subject of your
20 memorandum, was Councilmember Robinson, in 2020,
21 seeking to amend or revise the 2014
22 comprehensive plan amendment?

23 A. I don't recall. Obviously, in your --
24 you're well aware later -- I believe later --

1 you know, he wrote to the council regarding
2 amending the comprehensive plan. At this
3 juncture, I don't recall what I knew about his
4 intentions, nor would I characterize them. I
5 merely was trying to answer the questions and
6 provide the information that I thought would
7 inform the council's policy dialogue.

8 Q. And I want to direct your attention to
9 the second-to-last paragraph of your memorandum
10 on page 3. In looking at the second-to-last
11 paragraph, you write, council has in recent
12 years discouraged staff from proactively working
13 with LC (or Steiner).

14 Do you see that?

15 A. I'm sorry, what page or paragraph?

16 Q. Page 3, second-to-last paragraph.

17 A. Okay. I gotcha.

18 MR. SCHUMACHER: Maybe you better read
19 the whole thing, then.

20 THE WITNESS: I will.

21 Q. And directing you to the last sentence
22 of that paragraph where you wrote, council has
23 in recent years discouraged staff from
24 proactively working with LC (or Steiner).

1 Do you see that?

2 A. Yes.

3 Q. Did I read that correctly?

4 A. You read the memo that's before me
5 correctly.

6 Q. Okay. And LC, would that be Lifestyle?

7 A. Yes.

8 Q. And Steiner, is that Yaromir Steiner?

9 A. Yes.

10 Q. Who from council had discouraged staff
11 from proactively working with either Lifestyles
12 or Yaromir Steiner?

13 A. I don't know that I can specifically
14 say. I think we had a lack -- I think I
15 characterized earlier, a lot of community
16 discourse -- and let me make sure I'm thoroughly
17 answering -- I mean, appropriately answering
18 your questions. I don't -- I can't recall --
19 the reason I said I can't specifically say is I
20 can't recall the specific conversations I had
21 with each councilmember about these topics. So
22 it's difficult for me to say, oh, well, in X
23 year or Y date, you know, this councilmember
24 said this.

1 what I can say is that we had a lack of
2 consensus or a lack of clarity or agreement on,
3 you know, direction related to the property.
4 The community was, you know, fractious. I mean,
5 we had the charter amended. We had, you know,
6 this as a theme that ran through multiple
7 council elections. We had strongly held views
8 on council about different aspects of the
9 comprehensive plan and potential directions for
10 the community. And it was difficult to
11 navigate.

12 And I tried a number of things to inform
13 and facilitate dialogue. You mentioned them
14 earlier. We met with community members, we held
15 public meetings, or LC held the public meeting
16 in 2014 and got a vociferous response. I
17 brought Dr. Marlowe in. And none of that, from
18 my perspective, was successful, and I took
19 ownership in that in helping -- in yielding
20 clarity on the direction staff should take in
21 advancing particular goals around that property.
22 So this memo is likely me being
23 uncharacteristically frustrated or something
24 about where we were and outlining the options.

1 Once again, outlining the options that I thought
2 were available to the city.

3 Q. Okay. So an uncharacteristic statement.
4 But what I asked you was which councilmembers
5 had discouraged staff that you're referring to?

6 A. So I can't go back to specific
7 conversations and say this councilmember
8 discouraged us on this date. I can't remember
9 those. But I think, in general, we had a lack
10 of clarity, and by that lack of clarity, we were
11 discouraged from doing anything proactive
12 because we didn't have -- we didn't know what
13 the council would support.

14 Q. And when you reference staff here, are
15 you referring to any particular staff members?

16 A. No.

17 Q. To yourself?

18 A. I think I'm just talking generally about
19 staff and city employees as a whole.

20 Q. Okay.

21 A. And myself. But again, I can't point to
22 a specific conversation or a group conversation
23 that I have in my memory that informed that
24 sentence.

1 Q. Yet, in each one of the instances that
2 you referenced, whether it's Mr. Marlowe's
3 visioning process, whether it's the framework
4 that you prepared, you didn't consult UMCH or LC
5 proactively, did you?

6 A. This is -- go ahead.

7 MR. SCHUMACHER: I'm trying to
8 understand the question, but go ahead.

9 A. This is an important question. Can you
10 read it back to me, please?

11 (Record read as requested.)

12 A. Yes, in some instances.

13 Q. Which instances?

14 A. Let me -- I'll discuss that. So in the
15 framework document, it was my thinking about
16 what the options were. So I'm sharing with the
17 council and whoever wants to read it, you know,
18 what do I think of the options available. Like
19 I said, I don't think I consulted a lot of
20 people on that. I may have shared it internally
21 with staff.

22 In the case of Dr. Marlowe's work, I
23 believe he met with the board of -- and I'd have
24 to refresh my memory on this. But I believe

1 UMCH was approached as part of that, and then I
2 met with Bo Brownlee on that and shared -- I
3 believe I shared with him one of the Dr. Marlowe
4 process drafts. Additionally, Yaromir Steiner
5 was involved at that point. He had had meetings
6 with councilmembers and staff. No concept
7 proposal from Yaromir was received ever. It was
8 more engagement but not specifics. When Yaromir
9 came forward, I remember -- I don't know why I
10 remember this and not other things, but I
11 remember we were -- you know, we were -- we
12 didn't really know the -- all the UMCH and
13 Lifestyle relationships, but we were careful to,
14 you know, make sure Lifestyle knew we were
15 engaging with OhioHealth or Yaromir when it was
16 the subject of that -- of the property over
17 here. So I did that. And I believe Dr. Marlowe
18 talked to Yaromir as well.

19 So I don't think you can characterize it
20 as we never interacted with -- with either LC or
21 their representatives or people who were
22 advancing things that LC had an interest in. I
23 think we did in that case.

24 Q. Now, my question was about staff. And

1 you mentioned that you had conversations with
2 Mr. Brownlee?

3 A. I did.

4 Q. What conversations are you referring to?

5 A. I met with him once and talked
6 specifically about the Dr. Marlowe effort. I
7 believe I gave him a draft, one of these drafts
8 that you have reflected here, and, you know,
9 said we're -- you know, I'm attempting to
10 develop some kind of alternative dispute
11 resolution process.

12 Q. Did you have any other conversations
13 with Mr. Brownlee or anyone else from Lifestyles
14 regarding the development of the UMCH property,
15 you know, these proactive discussions, as you've
16 characterized it?

17 A. When?

18 Q. From leading up to January of 2020.

19 A. I don't recall that I did. I don't
20 specifically remember.

21 Q. Your conversation with Bo Brownlee
22 concerning the --

23 A. Again, we hadn't heard from them with
24 any substantive proposals from LC since 2015.

1 Most of the private interest, meaning -- came
2 from either OhioHealth, EMH&T in the one little
3 instance, or Yaromir. Lifestyle had seemed to
4 go roughly largely dark. And we weren't
5 proactively engaging them because we were having
6 a difficult time discerning our own interests.

7 Q. With respect to the conversation you had
8 with Mr. Brownlee regarding Mr. Marlowe's -- or
9 Harlowe's? Sorry.

10 A. Marlowe. It might be a typo. It's
11 Marlowe.

12 Q. Okay. Marlowe. With Mr. Marlowe's
13 visioning process, there are two attachments to
14 your email here in Exhibit 30. Did you share
15 either of these attachments with Mr. Brownlee?

16 A. I believe I shared information with him.
17 At what point in all this process I met with him
18 and what I specifically shared with him I don't
19 recall. I remember the goal of my meeting with
20 him and reaching out with him was to inform him
21 that we were -- that we were talking about this
22 and that, you know, we were having some
23 engagement with Yaromir about it, and that --
24 you know, that it was a sincere effort on my

1 part. I think what Dr. Marlowe found was that
2 it was a highly divided issue in our community.

3 Q. Okay. There were -- at page 5835 --

4 A. 35?

5 Q. 35. Yes. It's a conclusions and
6 recommendations for a decision-making process
7 regarding the future use of the UMCH property.
8 It's a report prepared by Herbert Marlowe, dated
9 August 30th, 2018. It's marked draft.

10 A. Yes.

11 Q. Was this report ever finalized?

12 A. I don't think it ever had a draft taken
13 off of it because I believe he approached it as
14 something that was -- you know, it's process
15 design. It's not -- based on the feedback to
16 the drafts, that it would evolve. And might
17 constantly evolve if we had moved forward with
18 some elements of this process. So no, I don't
19 believe the draft ever came off of it.

20 Q. Did the city ever implement any of the
21 conclusions or recommendations from Mr. Marlowe?

22 A. I believe we -- well, we moved forward
23 with the visioning process.

24 Q. Sorry. My question was inartful. I was

1 referring to this report starting on page 35.

2 Did the city implement any of the
3 recommendations out of this particular report
4 dated August 30, 2018?

5 A. I would need to re-read it to answer
6 that question. If you want me to read it, I
7 will.

8 Q. That's okay. If you don't recall,
9 that's fine.

10 So turning to page -- the second page of
11 Exhibit 30. There's another report submitted by
12 Analytica dated January 18, 2019.

13 A. What page is that?

14 Q. It's the second page of the exhibit.

15 A. Okay. Analytica is Dr. Marlowe.

16 MR. SCHUMACHER: Maybe we should read
17 the whole document.

18 Q. So this is the second attachment to your
19 email.

20 A. Okay.

21 Q. And the January 18, 2019, report is
22 titled the Proposed Process Architecture for
23 Community-wide Visioning Process for the City of
24 Worthington, Ohio, and Proposed Process

1 Architecture for Development of Acquisition
2 Scenarios for UMCH property.

3 A. Yes.

4 Q. So there was two different reports, both
5 by Dr. Marlowe or his organization; is that
6 fair?

7 A. I would need to go through this and try
8 to differentiate what is what because what I
9 can't tell is whether you're handing me, you
10 know, drafts that he did or things that he did
11 as he's interviewing people to think about it,
12 that he shared with me, or whether you're
13 handing me a draft at one stage of his thinking
14 and then a final draft or like a -- the draft
15 that got presented to council. So just
16 off-the-cuff I can't distinguish the differences
17 here.

18 Q. Mr. Greeson, I'm not handing you
19 anything. These are attachments to your own
20 email.

21 A. Okay.

22 Q. And I'm just trying to understand -- if
23 you turn to your email itself, I'm trying to
24 understand which attachment is which.

1 A. Well, then, you're going to have to give
2 me a little time.

3 Q. Sure.

4 A. I think my email answers your previous
5 questions. He left the documents as draft,
6 presumably to reserve the ability to modify them
7 in content and approach as the community
8 co-created a process. So he left it as draft.
9 I was correct in that.

10 And then my email outlines that in his
11 first report it's his assessment of the
12 situation and some potential process
13 recommendation, and then the -- and then a
14 refined version is the second document.

15 Q. Right. And so the question I have for
16 you is, when you're saying first or second, the
17 first one is later in time, and so I'm trying to
18 discern what you meant by first or second.

19 A. Yeah, I don't know why that's the case.
20 So the first one would be August 30th, 2018.
21 It's after he's interviewed people and he's
22 contemplating a, you know, process for
23 reconciling the debate he heard. And then the
24 second one, which is the one dated January 18th,

1 2019, he digs into -- it looks like more detail
2 on the actual scope of, you know, some of the
3 processes he contemplated earlier in the first
4 draft.

5 Q. Okay. Thank you.

6 Earlier you mentioned, Mr. Greeson, an
7 organization called Project Community Park. Do
8 you recall that?

9 A. Yes.

10 Q. And what is your understanding of what
11 Project Community Park was seeking with respect
12 to the UMCH property?

13 A. I think their records probably speak for
14 itself and that you probably have them, because
15 they're a matter of record and they have
16 websites and things like that, but essentially
17 that the city buy the land, that some large
18 portion of it be set aside and developed as a
19 park.

20 Q. And Mr. Robinson -- Councilman Robinson
21 is a member of Project Community Park; is that
22 correct?

23 A. I don't know his -- so I don't know how
24 they're structured. I can only tell you who I

1 interacted with over time, and it's a community
2 organization. Who a member is -- I don't know
3 if they have members or they just have a group
4 of people that are working together that are
5 leading it. He has had some involvement with
6 members of -- or people who have participated in
7 Project Community Park. What all his roles
8 were, I don't know.

9 Q. Okay.

10 --0--

11 (Deposition Exhibit 31 marked.)

12 --0--

13 BY MR. INGRAM:

14 Q. Mr. Greeson, you've been handed what's
15 been marked as Exhibit 31, which is a November
16 27, 2018, Summary of Phases for Development of
17 the UMCH Property on Adam F. Florey law firm
18 letterhead -- the Florey Todd Law Firm, I should
19 say, letterhead. Do you see that?

20 A. I do.

21 Q. Are you familiar with Mr. Florey's
22 summary of phases for development of the UMCH
23 property?

24 A. I remember it. I can't say I am

1 in-depth familiar with it at this point unless I
2 re-read it.

3 Q. Okay. When is the first time you were
4 provided a copy of Exhibit 31?

5 A. That's a good question. I don't recall.
6 I don't believe I received it when it was
7 produced. Mr. Robinson provided it to me at
8 some juncture, and I am probably spending more
9 time with it now than I did then.

10 Q. So Mr. Robinson provided this to you?

11 A. Yes.

12 Q. Do you know who paid for this to be
13 created by Attorney Florey?

14 A. I know that the city did not -- the city
15 did not solicit this memo, nor it did pay for
16 it. And I don't know the answer to whether
17 anyone else solicited it and paid for it or
18 whether Mr. Florey proffered it on his own. I
19 don't know.

20 Q. So you don't know who paid for this?

21 A. I don't even know if it was paid for. I
22 have no idea.

23 Q. Do you know attorneys who put forth
24 memos for free?

1 MR. SCHUMACHER: Objection.

2 Argumentative.

3 MR. SILK: Might have.

4 MR. SCHUMACHER: You don't need to
5 answer that question.

6 A. I don't know -- I don't know the genesis
7 of this. I don't know who asked for it. I
8 don't know if it was paid for. I was provided
9 it. I was not involved in asking for it.

10 Q. What were the circumstances that -- in
11 which Councilman Robinson provided this summary
12 from Attorney Florey to you?

13 A. I'm not sure. I don't recall a specific
14 circumstance. I don't recall specifically when.
15 And I can't remember that there was any, you
16 know, event that caused him to do that. I just
17 remember that he provided it, probably inform --
18 you know, to give me information.

19 Q. Did he provide you a hard copy? Did he
20 email it to you?

21 A. I believe it was a hard copy, and I
22 don't believe it ever left my desk until it was
23 provided to you. Well, maybe I gave it to the
24 law director, but I don't remember doing

1 anything with it.

2 Q. Okay. Do you know, was there anyone
3 else in the room with you and Mr. Robinson when
4 he provided you this legal summary?

5 MR. SCHUMACHER: Objection. That
6 assumes facts not in evidence.

7 A. I don't even remember how he provided it
8 to me. I think it was in paper, but I don't
9 remember whether he handed it to me, whether it
10 was sent to me. I don't remember.

11 Q. Do you know Attorney Florey?

12 A. I believe I have met him once.

13 Q. Okay. And has the city --

14 A. No, I don't feel like I know him.

15 Q. Has the city ever engaged Attorney
16 Florey for any legal matters?

17 A. Not that I'm aware of. Nor would I
18 agree with all of the stuff in this.

19 --0--

20 (Deposition Exhibit 32 marked.)

21 --0--

22 MR. SCHUMACHER: He found it.

23 THE WITNESS: Good work.

24

1 BY MR. INGRAM:

2 Q. Mr. Greeson, you've been handed what's
3 been marked as Exhibit 32, which is a memorandum
4 from you to City Council, dated January 22nd,
5 2019, the subject of which is the exploratory
6 working paper, cost-to-serve analysis for the
7 UMCH property. Do you see that?

8 A. Yes.

9 Q. And for purposes of the record, Exhibit
10 32 is Bates stamped Worthington 126963 through
11 126990.

12 Is that your signature --

13 A. Yes.

14 Q. -- on the first page of Exhibit 32?

15 A. Yes.

16 Q. And is this the cost-to-serve analysis
17 that you referenced this morning?

18 A. Yes.

19 Q. So originally, five scenarios were
20 drafted as part of this analysis, correct?

21 A. I don't know if we -- let me read what I
22 wrote here.

23 Q. Second sentence.

24 A. Yeah, I think we didn't do a full

1 analysis on five scenarios, just going off
2 memory here. There was an analysis done on five
3 scenarios, but there were -- kind of like here
4 are the scenarios we might analyze, and then got
5 some feedback from council and then went about
6 doing the analysis. We didn't want to spend
7 time -- this was a period where we were
8 struggling to fit this into the work schedule,
9 and we didn't want to spend time evaluating 20
10 scenarios. We wanted to narrow the field to
11 make sure we were giving council information
12 that was helpful.

13 Q. So based on the earlier documents we
14 were looking at, the request for the scenarios,
15 it was discussed during the City Council retreat
16 in early 2018. Councilman Robinson had some
17 follow-up emails to you about that. And then in
18 January of '19 you provided this memorandum. Is
19 that fair?

20 A. Yeah, but I would say the cost of
21 different types of development had been an issue
22 and a question longer than that. People were
23 seeking and desiring information that could
24 make -- you know, that would help them

1 understand the options, both in the community
2 and for the council, and they -- and so I don't
3 think it was only those limited emails and
4 debate. It had kind of had been out there as an
5 issue, and we were finally bringing focus to it.

6 Q. Okay. And who prepared this analysis
7 set forth in Exhibit 32?

8 A. Robyn Stewart, who was the assistant
9 city manager at the time, prepared it. Other
10 staff, obviously, had to give input regarding
11 their services and their -- you know, and the
12 various costs. But she was the primary author
13 or coordinator of the analysis.

14 Q. And then ultimately you obviously signed
15 it. Did you have some oversight or did you
16 participate with the preparation of this
17 analysis?

18 A. I did not prepare it. She's
19 exceptionally good. But I would have read it
20 before it was distributed and perhaps I made
21 some comments on it to make it for clarity or --
22 but I don't recall any of my edits, if I made
23 any. I don't recall whether I made any, quite
24 frankly. But I'm sure I reviewed it before I

1 transmitted it.

2 Q. Now, three of the scenarios that were
3 analyzed in this memorandum were developed by
4 staff, correct?

5 A. Go back to the memo I wrote, since I
6 don't recall all the details. That's what my
7 memo says, so I believe that to be true.

8 Q. Okay. Did you participate in creating
9 these three hypothetical scenarios?

10 A. I don't specifically recall, but I
11 imagine I was part of the staff conversation
12 that discussed them.

13 Q. Did you or any of your staff consult
14 with UMCH or Lifestyles in connection with
15 creating either of those three scenarios?

16 A. I don't specifically recall that we did.
17 I don't have a specific memory of that. I know
18 that we were being very careful to run the
19 analysis, figure out what the scenarios that we
20 were going to analyze were, what they wanted to
21 know about, and then objectively analyze it
22 without, you know, outside influence. So I
23 don't know that we would have, but I can't
24 specifically remember.

1 Q. Okay. But the fourth scenario in the
2 analysis was based on the white paper issued by
3 the WARD organization in January 2018, correct?

4 A. That appears to be what I wrote in the
5 memo, so yes.

6 Q. And with respect to WARD's white paper,
7 what inputs from WARD did the analysis rely
8 upon?

9 A. Other than what they wrote in their
10 paper? Are you asking me if they had any -- if
11 there was any discussion with them other than
12 taking what they wrote in their white paper and
13 trying to analyze it?

14 Q. Sure. That's my question.

15 A. Okay. I don't recall that we had any
16 interaction with them where they would have
17 influenced them. So no, I don't have any
18 specific memory of interacting with WARD or
19 Ms. Steward interacting with WARD on the details
20 of how we completed this. I believe it was done
21 objectively without much outside influence once
22 we understood what we were analyzing.

23 Q. And what data or what information was
24 used as part of this analysis to arrive at the

1 projections?

2 A. Bear with me. I will read some and
3 answer your question --

4 Q. Take your time.

5 A. -- to the best of my ability.

6 Can you repeat the question now?

7 (Record read as requested.)

8 A. I think, if you look at -- it would be
9 the second page of the packet that you handed
10 me, the exhibit that you handed me. I think
11 Ms. Stewart writes pretty clearly in answer to
12 your question, you know, each -- each -- each
13 department, each service area attempted to
14 determine what it would cost to provide
15 services. Not a proportional allocation, but
16 each service area determining whether there
17 would be additional costs. So looking at
18 whether or not it would cost -- require
19 additional staff, contract services or supplies
20 to serve different types of new development.
21 And so it relied somewhat on the expertise of
22 the staff and the various departments who in all
23 likelihood looked at their costs of their -- of
24 providing services to other aspects of

1 Worthington.

2 Q. Okay. But did staff interview anyone or
3 any experts in connection with the assumptions
4 they're making? And I'll just give you an
5 example. When we're talking about the
6 hypothetical residential portions of this
7 analysis, what value of the structures -- what
8 was the assumed valuation of the homes or the
9 apartments, or what was the assumption of how
10 much the income would be by the subsequent, you
11 know, residents, those kind of assumptions?

12 A. Without thoroughly reviewing this report
13 and talking to some of the people that were
14 involved in it, I, at this point, can't recall
15 the specifics and all of the data points that we
16 drew upon or Ms. Stewart collected and asked for
17 in order to arrive at these scenarios or this
18 analysis. My role was to review the overall --
19 is to call for it to be done, review the overall
20 work product, and then transmit it to council.
21 And I think, if you look at the third paragraph
22 on the first page, it pretty clearly says it's
23 hypothetical. We did the best we could with the
24 information we had. You know, it's rough

1 estimates and were developed by each department
2 based on their sense of how their services would
3 be impacted, utilizing assumptions that were
4 made and outlined in the document. And, you
5 know, I think she does a good job caveating the
6 whole report there. That should answer your
7 question.

8 Q. Okay. And to be specific, with respect
9 to the analysis set forth in Exhibit 32, to your
10 knowledge, no one reached out to Lifestyle to
11 get their input on any of the assumptions or
12 inputs here?

13 MR. SCHUMACHER: To get Lifestyle's
14 input on the cost to the city? Is that your
15 question?

16 MR. INGRAM: I'm talking about this
17 entire analysis, not just the cost to the city.

18 MR. SCHUMACHER: Why would they go to
19 Lifestyle to find out what it costs to run a
20 park or to provide services to a development, a
21 hypothetical development?

22 A. I think that's a good point. I mean, I
23 think, actually, I made that point earlier in
24 the day. We would not customarily consult a

1 developer on what it costs to provide city
2 services to a particular development. We
3 might -- there's cases where they require
4 developers to commission those studies, you
5 know, whether it's school impact studies or
6 service impact studies. But we wouldn't
7 customarily do that. And I don't recall that we
8 had any interaction with Lifestyle during this
9 analysis, nor would it be necessary to in order
10 to complete the work we were doing.

11 Q. Okay. So just so I understand, it
12 wouldn't be necessary to contact the property
13 owner in connection with what it desired to use
14 on its property, or develop on its property in
15 order to assess what revenues or costs could be
16 derived from it? I just want to be clear.

17 MR. SCHUMACHER: We hadn't had a
18 proposal since 2015, Chris.

19 MR. INGRAM: Counsel, if you're going
20 to -- I don't understand. Is this an objection?

21 MR. SCHUMACHER: Yes. That's an
22 objection.

23 MR. INGRAM: Okay. Well, if you can lay
24 off the speaking objections, I'd appreciate it.

1 MR. SCHUMACHER: At least it's not a
2 solil --

3 MR. SILK: Soliloquy.

4 THE WITNESS: Can you re-read the
5 question?

6 (Record read as requested.)

7 THE WITNESS: Can you re-read the first
8 section again?

9 (Record read as requested.)

10 A. No, I'm not aware that we reached out to
11 Lifestyle.

12 Q. And was the analysis set forth in
13 Exhibit 32 ever revised or updated, to your
14 knowledge, Mr. Greeson?

15 A. I don't believe so. I'm not aware of
16 any revisions or update of it. Maybe there's
17 been some since I left, but I'm not aware of
18 any.

19 Q. Was an analysis similar to this
20 conducted when Lifestyle's rezoning application
21 and development plan was filed with the city?

22 A. I don't think we conducted -- not that
23 I'm aware of. Nor would -- nor would we
24 necessarily do that.

1 MR. INGRAM: All right. We've been
2 going for about an hour. Probably a good spot
3 to take a break.

4 MR. SCHUMACHER: We've come to an
5 agreement.

6 MR. INGRAM: Is now a good time for a
7 break?

8 THE WITNESS: That would be great.

9 (Recess.)

10 --0--

11 (Deposition Exhibit 33 marked.)

12 --0--

13 BY MR. INGRAM:

14 Q. Mr. Greeson, I've handed you --

15 MR. SCHUMACHER: I think he's still
16 reading.

17 THE WITNESS: I'm almost done. Hang on
18 one second. Oh, I'm not almost done because I
19 think the second page I need to read, too.

20 Q. And just for purposes of the record,
21 Mr. Greeson, I've handed you what's been marked
22 as Exhibit 33, which is an email chain, the
23 first email of which is from David Robinson,
24 carbon copying you as well, and it includes

1 other members of City Council, dated January
2 2nd, 2018.

3 And I would actually start at page 3,
4 the last page of Exhibit 33, if I could direct
5 your attention there first.

6 A. If I may finish reading, I'd appreciate
7 it.

8 Q. Sure. You can finish reading the second
9 page.

10 MR. SCHUMACHER: But not the third?

11 A. Okay.

12 Q. So have you read the entirety of Exhibit
13 33, Mr. Greeson?

14 A. I think so.

15 Q. Okay. And I had the opportunity during
16 one of our breaks to review Mr. Robinson's bio
17 on City Council and confirmed that City
18 Councilman Robinson was elected in November
19 2017, and therefore first became a member of
20 City Council in January of 2018. Does that
21 sound correct to you?

22 A. It does.

23 Q. And so when we're looking at page 3 of
24 Exhibit 33, Mr. Robinson is emailing

1 Councilperson Michael and CC'ing you on December
2 31st of 2017. Do you see that?

3 A. Yes.

4 Q. And at this point in time, when he sent
5 this email, he's not a member of City Council,
6 correct?

7 A. He's a councilmember elect at that
8 point. He hasn't been sworn in.

9 Q. Thank you.

10 And in December he was emailing -- I'm
11 sorry. He emailed but also left a voice mail
12 with Council President Michael at the end of
13 December in 2017. Do you see that?

14 A. Yes.

15 Q. And he asked Council President Michael
16 to put on the City Council agenda for City
17 Council's January 8, 2018, meeting, the topic of
18 the UMC portion of the comprehensive plan; is
19 that correct?

20 A. That's what this -- these documents
21 indicate.

22 Q. But that Council President Michael
23 declined to do so; is that fair?

24 MR. SCHUMACHER: Are you asking him

1 whether that happened, or whether the document
2 reflects that?

3 Q. Do you have any --

4 A. I don't have a recollection of that
5 specific debate now all these years later. But
6 I believe these documents to be accurate. I'm
7 sure if Bonnie said it, that's what happened --
8 wrote it, that's probably what happened.

9 Q. Mr. Greeson, with respect to the topic
10 of the UMC portion of the comprehensive plan,
11 that's referencing the 2014 amendment to the
12 comprehensive plan, correct, that we looked at
13 in Exhibit 1?

14 A. I presume that that is what council
15 president at the time Michael -- I believe
16 that's what they're referencing, yes, to
17 Mr. Robinson and Ms. Michael in this email
18 exchange.

19 Q. And then we see on page 2 Ms. Michael
20 indicated to Mr. Robinson that this topic is to
21 be included in our council retreat on February 9
22 and 10; is that correct?

23 A. That's what she says, yes.

24 Q. So is the -- was the September 2014 land

1 use plan for the UMCH site -- was that put on
2 the agenda for the 2018 City Council retreat at
3 Mr. Robinson's request or President Michael's
4 request?

5 A. You went through the retreat documents
6 earlier, right?

7 Q. The 2018 was set forth in Exhibit 27,
8 correct.

9 A. I don't think expressly because of these
10 emails -- I mean, it appears in Exhibit 27
11 what's outlined is a process where the
12 facilitators met with councilmembers, myself,
13 and other key staff who identified issues that
14 might need to be discussed in a planning retreat
15 or -- and so I'm sure they would have
16 expressed -- I assume that they then expressed
17 that to the facilitators and that led to some
18 discussion at the retreat, but I don't remember
19 specifically how all that transpired.

20 Q. Okay. I do recall what Exhibit 27 said.
21 The purpose of my question is, is the way
22 President Michael's characterized her response
23 to at that time Mr. David Robinson in which she
24 says, to that end, I told you that this topic is

1 to be included in our council retreat February 9
2 and 10, and so based on what she says here in
3 her email, this is beyond just -- this topic
4 goes beyond an interview with the facilitator.

5 A. What's your question?

6 Q. I'm trying to figure out how --

7 MR. SCHUMACHER: It was a statement, not
8 a question.

9 Q. I'm trying to figure out how Exhibit 1,
10 the UMCH portion of the comprehensive plan, was
11 set to be discussed during the retreat, whether
12 that was at President Michael's direction, was
13 it Mr. Robinson's direction. Do you recall? Do
14 you know one way or the other?

15 A. I don't recall.

16 Q. Fair enough.

17 --0--

18 (Deposition Exhibit 34 marked.)

19 --0--

20 BY MR. INGRAM:

21 Q. Have you had an opportunity to review
22 what's been marked Exhibit 34, Mr. Greeson?

23 A. Yes.

24 Q. Mr. Greeson, Exhibit 34 is an email from

1 Council President Michael to you dated March
2 21st, 2020. Do you see that?

3 A. Yes.

4 Q. And Council President Michael's email
5 has the subject 2014 UMCH comprehensive plan
6 update - motion to temporarily suspend.

7 Do you see that?

8 A. Yes.

9 Q. President Michael says, Matt, we need to
10 talk on logistics.

11 Do you recall this particular issue
12 being discussed with Council President Michael?

13 A. I remember the issue that is in the
14 email chain and Mr. Robinson's email and the
15 issue. I don't recall the specific conversation
16 with Mrs. Michael.

17 Q. Looking at Exhibit 34, there's a
18 forwarded message that she sent to you, and I
19 believe you were CC'd on that email anyways,
20 from David Robinson to members of City Council
21 and CC'ing you and others with the city, dated
22 September 20, 2020. Do you see that?

23 A. I do.

24 Q. And looking at top paragraph of page 2

1 of Exhibit 34, among other things, Councilman
2 Robinson says, accordingly, I will be making a
3 motion at tomorrow night's meeting to
4 temporarily suspend the UMCH portion of the
5 comprehensive plan pending further update.
6 Please know that I am going to make this motion
7 in this rather sudden manner because of the
8 urgency that we act while we can.

9 Do you see that?

10 A. I do.

11 Q. Did Councilman Robinson talk to you
12 about this sudden motion to temporarily suspend
13 the UMCH portion of the comprehensive plan
14 before he sent this email?

15 MR. SCHUMACHER: Objection. Form.

16 A. I don't have a specific memory of him --
17 of having a conversation with him. I don't
18 recall.

19 Q. You don't recall one way or the other
20 or --

21 A. I don't recall a conversation. I really
22 don't recall one way or the other.

23 Q. And Mr. Robinson's email says, please do
24 not reply all. Do you know why that would be?

1 A. Yes, under -- we had well coached
2 councilmembers, if you get in a circular
3 exchange of emails, you can inadvertently create
4 a public meeting under Ohio law, and we were
5 diligent that if somebody proffered their
6 opinion via email that they didn't end up
7 getting into a debate that should happen in the
8 public via email. And so we always advised our
9 councilmembers to say don't reply all, because
10 they could end up having a public meeting and
11 they didn't even intend to.

12 Q. Okay. Now, with respect to this
13 proposed -- to Councilman Robinson's proposed
14 motion, would that proposed motion have been set
15 forth on that meeting's agenda?

16 MR. SCHUMACHER: This hypothetical
17 motion?

18 A. When did he write it? What day of the
19 week?

20 Q. It was the night before the City Council
21 meeting.

22 A. The agenda would have been released the
23 prior Thursday.

24 Q. And in order to make it on the agenda,

1 is it generally understood that matters must be
2 presented to the clerk the Thursday before
3 the -- that meeting?

4 A. To be on the written agenda that the
5 staff distributes and posts on the website.

6 Q. Is there some other agenda?

7 A. No.

8 Q. Okay.

9 A. But that doesn't mean that matters that
10 are not listed on the agenda can't come up in
11 the meeting. There's opportunity for that, both
12 at the end of the meeting and beginning of the
13 meeting, whatever council wants. But on the
14 written agenda would come out usually the
15 Thursday unless we supplement it.

16 Q. And with respect to the logistics, now
17 that you've looked at Councilman Robinson's
18 email, do you recall what happened with this
19 particular effort?

20 A. My recollection is that it didn't move
21 forward, that there was an interest in amending
22 the comp plan at that point. I don't actually
23 recall right now if he made the motion and
24 whether there's a vote on it actually. I don't

1 have a recollection of that.

2 Q. We can refer to the meeting minutes.

3 A. Yes. I did not -- I don't think I read
4 those meeting minutes.

5 ==0==

6 (Deposition Exhibit 35 marked.)

7 ==0==

8 MR. INGRAM: Sorry, I handed you the
9 wrong version.

10 MR. SCHUMACHER: I think the highlighted
11 one is just fine.

12 THE WITNESS: I didn't read it anyway.

13 MR. INGRAM: That's fine. I was looking
14 for my copy.

15 BY MR. INGRAM:

16 Q. Mr. Greeson, I've handed you what's been
17 marked as Exhibit 35, which is an email from you
18 to members of council and other Worthington city
19 officials, dated September 24, 2020, with a
20 subject line, UMCH discussion. Do you see that?

21 A. I do.

22 Q. And you were forwarding an email the
23 same date that you had received from Lee Brown
24 that contains a summary of the discussion that

1 you and Mr. Brown had along with the City's law
2 director with Tom Hart, who was the attorney for
3 Lifestyles. Do you see that?

4 A. Yes.

5 Q. I want to direct your attention to the
6 second paragraph of the second page of Exhibit
7 35, in which Mr. Brown notes that we also
8 discussed what occurred this past Monday at City
9 Council concerning the UMCH site. Do you see
10 that?

11 A. I saw it earlier. What paragraph?

12 Q. Sure. It's the second page, second
13 paragraph.

14 MR. SCHUMACHER: You should give him the
15 highlighted version.

16 Q. Here's the highlighted version.

17 A. There you go. Yes.

18 Q. So my question is: what happened at
19 that Monday meeting? This is days after the
20 email that we just reviewed in paragraph 34.

21 A. What happened at what Monday meeting,
22 City Council meeting?

23 Q. Correct. So in other words, during this
24 meeting that you had with Mr. Hart, one of the

1 issues summarized in --

2 A. So one thing I know is we get detailed
3 minutes and we record the video of all of those
4 meetings, and I think you can go back and watch
5 it. I can't at this point recall all the
6 details of that meeting.

7 MR. SCHUMACHER: I'm going to object as
8 asked and answered. I think you asked him that
9 question earlier, and he said he didn't remember
10 the details. But you can probably piece it
11 together by looking at the video.

12 A. I think that's right. I mean, I -- I
13 think Mr. Robinson expressed his interests that
14 he articulated in the email and council had a
15 discussion about that. I don't recall what
16 action was taken or whether he actually made a
17 motion, but we obviously were transparent with
18 Lifestyle about it.

19 Q. Okay. One of my questions is that --
20 what prompted your and Mr. Brown and
21 Mr. Lindsey's meeting with Mr. Hart?

22 A. I don't specifically recall. I don't
23 recall.

24 Q. The subject is UMCH discussion, and you

1 directed Mr. Brown to prepare a summary of that
2 discussion.

3 A. Yeah. And that had been our custom, if
4 there was a sensitive issue or an important
5 property or topic, would keep the council
6 apprised of what was going on. And so this
7 would be customary for such an important site.

8 Q. So did you direct Mr. Brown to prepare
9 summaries of all your discussions or meetings
10 with Lifestyles concerning the UMCH site?

11 A. I don't recall if all, but if there was
12 substantive things to inform the council about,
13 we would share with them what was going on with
14 major developments. So it was not unusual for
15 us to give them some information about sites
16 they maybe asked questions about.

17 Q. Okay.

18 A. Or had expressed concern about.

19 Q. So to the extent there were substantive
20 discussions regarding the UMCH site involving
21 Mr. Brown or you with Lifestyle, should I expect
22 to be able to read a summary -- a written
23 summary of that meeting since it was customary?

24 A. I don't know about every meeting, but at

1 times that were important, like they had gone
2 essentially dark for many years without much
3 interaction with them about any significant
4 development proposal. We hadn't really had
5 anything substantive from them since 2015. You
6 know, we had OhioHealth and we had Yaromir, but
7 really nothing from LC that would have suggested
8 that they were going to move forward with a
9 development that was anywhere like -- you know,
10 like they had in 2015. And so now they were
11 coming forward to talk about it again and that's
12 notable.

13 Q. From the context of Mr. Brown's summary
14 of the meeting you attended, it doesn't appear
15 that Mr. Hart was aware of what was discussed in
16 the prior Monday City Council meeting, because
17 he says he was going to have to -- or he was
18 going to view it online. So who asked for this
19 meeting?

20 A. I don't remember.

21 MR. SCHUMACHER: Keep in mind we're
22 during COVID here. These were all virtual.

23 A. I mean, there's a couple things going on
24 in the life of the city at the time. One is I'm

1 managing an organization that's responding to
2 COVID, and we were spending a lot of time on
3 police matters because, after George Floyd was
4 killed, we had 14 protests in Worthington of
5 various sizes, and I had a lot of focus on that
6 at the time. That's what's going on in the city
7 manager's life when all this is happening, too.

8 Q. Okay. My question was just simply who
9 asked for the meeting?

10 A. I don't know.

11 Q. Okay.

12 A. I don't recall.

13 --0--

14 (Deposition Exhibit 36 marked.)

15 --0--

16 BY MR. INGRAM:

17 Q. Have you had an opportunity to review
18 what's been marked as Exhibit 36?

19 A. Yes, sir.

20 Q. Mr. Greeson, I've handed you what's been
21 marked as Exhibit 36, which is an email from you
22 to Councilmember Robinson and other members of
23 council and City of Worthington officials, dated
24 September 29, 2020. Do you see that?

1 A. Yes.

2 Q. And your email is a response to
3 Councilmember Robinson with a subject of UMCH
4 discussion with LC. Do you see that?

5 A. Yes.

6 Q. So if we look at Mr. Robinson's email to
7 you on the same date, he's emailing you about
8 Mr. Brown's summary that we just reviewed in
9 Exhibit 35, correct?

10 A. Yes.

11 Q. And he asked in his email, simple
12 question: why did you bring to Mr. Hart's
13 attention the UMCH-related discussion we just
14 had at council?

15 MR. SCHUMACHER: You misread that. It
16 says, we had just had at council. Sorry.

17 MR. INGRAM: I'll rephrase and re-read.

18 MR. SCHUMACHER: Guardian of the record.

19 BY MR. INGRAM:

20 Q. So let's try this again, Mr. Greeson.
21 On page 2 of Exhibit 36, Councilmember Robinson
22 asked you, quote, simple question: why did you
23 bring to Mr. Hart's attention the UMCH-related
24 discussion we had just had at council? End

1 quote. Do you see that?

2 A. Yes.

3 Q. And then you respond to Councilmember
4 Robinson's question; is that fair? Is that what
5 your email is doing?

6 A. Pretty clearly.

7 Q. All right. And did you have any
8 discussions with Councilmember Robinson about
9 the question he posed to you?

10 A. I don't remember having any
11 conversations with him. I can't recall.

12 This email answers the question to some
13 degree in your last -- regarding your Exhibit
14 35, which I couldn't recall, which is you asked
15 who asked for the meeting. It appears Mr. Hart
16 might have, based on this exhibit. I don't
17 recall that; but...

18 Q. Okay. You don't recall it one way or
19 the other. Well, here's the thing that puzzles
20 me a little bit, Mr. Greeson. Because when I
21 look at your email, the second paragraph on the
22 first page of Exhibit 36, in the second sentence
23 of that paragraph you wrote, Councilmember Smith
24 asks staff to make the potential applicant aware

1 of the conversation.

2 Do you see that?

3 MR. SCHUMACHER: It's the third
4 sentence.

5 MR. INGRAM: I stand corrected.

6 A. I see that. I don't know what it means,
7 but I see that.

8 Q. And so based on the context of these
9 emails, it at least appears to me that the UMCH
10 property -- or the UMCH portion of the
11 comprehensive plan was discussed during a City
12 Council hearing, and Councilmen Smith asked
13 staff to make the potential applicant aware of
14 that conversation. Is that fair?

15 MR. SCHUMACHER: That's a question?

16 MR. INGRAM: Yes.

17 MR. SCHUMACHER: Objection. Form.

18 A. Yes. I think I outline that fairly
19 clearly in this email, and while my memory -- I
20 don't recall all the specifics, this jogs my
21 memory to some degree. But I don't have
22 anything to add other than what's written in
23 this response to Mr. Robinson.

24 Q. Okay. But as far as the meeting that

1 you held with Mr. Hart on September 24, that
2 meeting came at Councilmen's Smith request
3 during the hearing; is that fair?

4 A. No, I don't believe it did.

5 Q. Okay. Why's that?

6 A. Bear with me. You know, later in the
7 email I say, as it relates to things being
8 publicly discussed by council and directly
9 affecting a party who has asked to meet with us,
10 and I believe that refers to Mr. Hart asking to
11 meet with us. He asked to meet with us, and
12 I -- and then I believe we informed them of what
13 had transpired in the council meeting. That's
14 how I read this. I don't have a specific
15 recollection of all those details.

16 Q. Okay. So you can't recall one way or
17 the other as to who asked for the meeting?

18 A. No.

19 Q. But you did know that Lifestyles was a
20 potential applicant at that time, correct?

21 A. I didn't know what their interests were.
22 of course, I thought they were a potential
23 applicant at some point, although we had not
24 heard from them in any substantive way since

1 2015.

2 Q. Well, I'm just using the words here in
3 your own email, Mr. Greeson, where both
4 Mr. Smith apparently referred to Lifestyles as
5 the potential applicant and where you do
6 yourself in the last sentence of your email.

7 MR. SCHUMACHER: He just told you that
8 he considered them a potential applicant.

9 A. Yeah. I think that's right. Any
10 property owner is a potential applicant. I
11 mean --

12 Q. Okay.

13 A. I don't remember what I knew about their
14 current interests at the time. So I don't -- I
15 don't put a lot of weight in that language
16 because I don't know that it really means a lot
17 to me. I wasn't trying to convey anything other
18 than that's what was said in the meeting.

19 --0--

20 (Deposition Exhibit 37 marked.)

21 --0--

22 BY MR. INGRAM:

23 Q. Mr. Greeson, I've handed you what was
24 marked as Exhibit 37, which is an email from you

1 to Councilmember Robinson, dated October 13,
2 2020. The subject of your email is the nature
3 of the UMCH comp plan update. Do you see that?

4 A. Yes.

5 Q. And for purposes of the record, Exhibit
6 37 is Bates stamped Worthington 58372 through
7 58376, with page 76 being entirely blank.

8 MR. SCHUMACHER: You're welcome. So
9 it's not a million pages, it's 999,000.

10 Q. And the attachment to -- the attachment
11 to your email to Councilmen Robinson includes a
12 memorandum written by you that we previously
13 looked at earlier?

14 MR. SCHUMACHER: He was still reading
15 the document. I think you were distracting him.
16 Sorry.

17 MR. INGRAM: He already indicated he
18 read the exhibit, I thought.

19 MR. SCHUMACHER: Sorry.

20 A. I was in a contemplative mind-set here.
21 Go ahead.

22 BY MR. INGRAM:

23 Q. And the attachment to your email in
24 Exhibit 37 is a memorandum that you issued, you

1 signed, and we've already discussed earlier
2 today. Do you recall that?

3 A. Yes.

4 MR. SCHUMACHER: Another copy of the
5 same document.

6 Q. You were asked by Councilmen Robinson on
7 October 24, 2019, to put in writing how one may
8 describe the nature of the UMCH comp plan update
9 process and final product.

10 Do you see that?

11 A. I do see it.

12 Q. And in your response, among other
13 things, you wrote, at this point, I'm not
14 comfortable with being asked to characterize the
15 comprehensive plan as a whole or any section as
16 anything other than the adopted policy document
17 of the City Council.

18 Do you see that?

19 A. I do see that.

20 Q. Okay. So why did you not respond
21 directly to Councilmen Robinson's question?

22 MR. SCHUMACHER: Objection.

23 A. Let me re-read his email, please.

24 Q. Go ahead.

1 A. I'm not sure. In re-reading his
2 question, he's using words like -- you know,
3 he's challenging -- his words, not mine --
4 challenging the notion that the update is a
5 consensus document, and so he's asking me to
6 characterize it with nontechnical terms. My
7 role as a city manager is to, you know, work
8 with the policy documents of the City Council,
9 laws adopted by the city. A comp plan's not
10 law, but the set of guidelines the council had
11 adopted. This particular councilmember felt
12 very strongly that the strategic direction
13 outlined in the comprehensive plan -- he wasn't
14 the only one -- was directionally wrong, and
15 looks like I artfully avoided assigning
16 language, labels, characterizing the
17 comprehensive plan and just -- in some way that
18 might, you know, cause more division amongst my
19 councilmembers or between council and staff. I
20 think that's what I was doing.

21 Q. Fair enough.

22 A. Trying to be a diplomat, I guess.

23 Q. And in the course of your prior answer,
24 you referenced the strategic analysis and the

1 comprehensive plan, and you were pointing to
2 Exhibit 1; is that correct?

3 A. Yes, I believe so.

4 Q. Well, Exhibit 1 is right here, and this
5 is the document you were pointing to, correct?

6 A. Yes.

7 Q. Thank you.

8 You had already testified earlier this
9 morning that Councilmen Robinson disagreed with
10 Exhibit 1 as reflecting the consensus, if I
11 recall correctly.

12 A. Sure.

13 MR. SCHUMACHER: Hold on. Can you read
14 that question back, please.

15 (Record read as requested.)

16 MR. SCHUMACHER: Thank you.

17 A. Yeah, I think that's fair. Yes. And he
18 wasn't the only one in the community that felt
19 that way.

20 Q. And you said in your prior response he
21 wasn't the only one. Were there any other
22 councilmembers that aligned with Mr. Robinson's
23 view?

24 A. I think earlier in the -- well, I think

1 it's a matter of record, right? At least at
2 this juncture, Mr. Smith -- and I don't recall,
3 you know, when Mr. Bucher more clearly
4 articulated his thoughts on it. So I don't
5 recall when that happened. So yeah, we did not
6 have unanimity amongst councilmembers about --
7 about the strategic direction outlined in the
8 comprehensive plan.

9 And I think, if you watch the video,
10 there were some people who, you know, felt -- my
11 guess is -- my memory of it is that you'll hear
12 people wrestling with a lot of things. One is,
13 was this directionally correct? Another is
14 whether it's just time, so much time had passed
15 without a development application and without
16 anything going on there that there were some
17 that thought -- well, while they may have had
18 more favorable feelings towards the 2014 comp
19 plan, there may have been -- there were
20 councilmembers that were okay with, you know,
21 the possibility of updating the comp plan
22 because the bones of it hadn't been updated
23 since '05, and a lot had changed since 2014 in
24 terms of the public's, you know, sentiment, and

1 there had been hundreds and hundreds of people
2 who would give an opinion and lots of
3 controversy. So there were a variety of
4 opinions, and it was difficult to figure out
5 what the consensus or majority was.

6 Q. Well, one thing you said, though, was
7 this email is from October 13, 2020, or your
8 response was. And Councilman Robinson had sent
9 you a prior email a few days before on October
10 10th. Do you see that?

11 A. Yes, I do.

12 Q. And Lifestyle had actually filed its
13 rezoning application with its proposed
14 development plan on October 5th of 2020. So
15 there was a development plan pending before
16 council at the time.

17 A. Okay. Thank you for clarifying the
18 timeline.

19 Q. And so after Lifestyles had submitted
20 its rezoning application and development plan,
21 did Councilmember Robinson or Councilman Smith
22 or Councilman Bucher seek to amend the
23 comprehensive plan or circulate a proposal to
24 amend the comprehensive plan?

1 A. After they filed?

2 Q. Correct.

3 A. I don't recall that they did, no. And
4 it would be part of the record you have if they
5 did.

6 Q. And what I'm looking -- my question goes
7 more towards internal drafts or proposals that
8 were not made a public record.

9 A. Again, you would have them, if they
10 existed, and I'm not aware of any. The question
11 was comp plan amendments or -- no, I don't -- I
12 don't believe so. I don't have any recollection
13 of that.

14 Q. With respect to the emails you received
15 from Councilmen Robinson set forth in Exhibit
16 37, did you provide those emails to anyone?

17 A. I don't know. This response?

18 Q. Or his emails to you about a comp plan
19 update concerning the UMCH property.

20 A. In Exhibit 37, did I forward these, is
21 that what you're asking?

22 Q. Or share them with anyone else.

23 A. I don't remember.

24 Q. 2020, was Ms. Michael still the council

1 president?

2 A. Yes, I believe so.

3 Q. Did you discuss Mr. Robinson's
4 persistent inquiries about amending the comp
5 plan with Council President Michael?

6 MR. SCHUMACHER: Objection to the
7 characterization.

8 You can answer.

9 A. I don't know. I don't recall. But in
10 re-reading this email, I don't think it really
11 says a lot about amending it. It's just how I
12 would characterize the original plan update in
13 2014. So I don't know that I would have, but I
14 don't have any recollection one way or the
15 other.

16 Q. I guess, when I said amendment, I guess
17 I was referring to the temporary suspension that
18 Mr. Robinson had been raising and referring to
19 just prior to this point.

20 A. Yeah, no, I think he's, you know,
21 talking about how -- I think he's talking about
22 how I characterize the 2014 UMCH comp plan
23 update in these emails. He's not talking about
24 the desire to amend it.

1 Q. I see.

2 A. That's how I read this, and I believe
3 that's how I responded, it appears.

4 Q. Okay.

5 --0--

6 (Deposition Exhibit 38 marked.)

7 --0--

8 MR. SCHUMACHER: Get some substance now.

9 BY MR. INGRAM:

10 Q. While you're reviewing the document, for
11 purposes of the record, Mr. Greeson, I'm handing
12 you -- or I've handed you what's been marked as
13 Exhibit 38. It's a staff memorandum to you from
14 Lee Brown, dated November 8, 2021, and is Bates
15 numbered Worthington 3135 through page 3171. Do
16 you see that?

17 A. Yes. Okay.

18 Q. Do you recognize Exhibit 38,
19 Mr. Greeson?

20 A. Yes.

21 Q. Have you reviewed it before?

22 A. I have.

23 Q. Were you involved in preparing any
24 portion of Exhibit 38?

1 A. I was not, although I likely read it
2 before it went out the door.

3 Q. Did you make any revisions to --

4 A. I don't believe I made any revisions to
5 it. Again, my role, I'm not the city planner.
6 My role is to, you know, be aware of what we
7 were doing to oversee it, but I was relying on
8 Mr. Brown's technical expertise, which is good.
9 And I don't think I substantively impacted it.

10 Q. Did you discuss any portions of the
11 substance of this memorandum with Mr. Brown
12 before it was completed?

13 A. I likely discussed his conclusions with
14 him, but I don't have a specific memory of that
15 conversation.

16 Q. Okay. And why do you say you likely
17 discussed his conclusions with him?

18 A. Because I oversee -- ultimately oversee
19 the process and the work, and I think that's --
20 as city manager and one of our directors on a
21 big project and big sensitive issue like this, I
22 wasn't going to -- you know, he was likely going
23 to share his thoughts with me before he sent it
24 to the planning commission. But like I said, I

1 can't tell you a specific time or date or the
2 content of that. I'm just being forthright that
3 we likely talked about his analysis of it, and
4 then I likely reviewed it before it went out the
5 door. I just don't have a very specific memory
6 of all that.

7 Q. So other than Mr. Brown, are you aware
8 of any other city officials who participated in
9 the preparation of this memorandum in Exhibit
10 38?

11 A. I think, at that juncture, Mr. Brown
12 reported to Ms. Stewart, who was one of his --
13 as assistant city manager. We had done some
14 reorganization at some point where different
15 departments got realigned for reporting
16 relationships, and she had service parks and rec
17 and planning and development who reported to
18 her, and I believe she probably reviewed this
19 document to assist Mr. Brown in making sure that
20 we took a huge volume of information and wrote
21 it in a coherent fashion that was objective and
22 clear to the reader. She's an excellent writer.

23 Q. So would any of the recommendations set
24 forth in Exhibit 38 have been Ms. Stewart's

1 recommendations, or are they all Mr. Greeson's?

2 MR. SCHUMACHER: Did you say Greeson?

3 MR. INGRAM: I'm sorry. Mr. Brown.

4 MR. SCHUMACHER: If you want to stop
5 now, if it's too late for you, we can stop.

6 A. Well -- so this is the staff memorandum
7 to the City Council, and went to the planning
8 commission first, as you well know, with a
9 planning staff -- planning and development
10 department's -- planning and building, I should
11 say, department's staff recommendation to the
12 planning commission, and then this memo
13 transmits both the planning commission's and the
14 staff's original recommendation. And the
15 process for doing that is Mr. Brown writes me a
16 memo, as you see here, and then I send it to the
17 council through the agenda. I think your
18 question was whose recommendation was it.

19 Q. Let me clarify my question. Sorry. I'm
20 asking with respect to staff as opposed to
21 planning commission.

22 A. Well, Mr. Brown developed the original
23 recommendation for the planning commission, and
24 certainly I oversaw that, and so when we say the

1 staff recommendation, I think it's all of ours.

2 Q. But you didn't assist or provide the
3 recommendations, you just reviewed it at the
4 end, correct?

5 A. Yes. I may have talked to him about
6 some of his thinking and aspects of it along the
7 way, but again, I don't remember the details of
8 that. I mean, he would have shared those with
9 me. But no, I didn't write this.

10 Q. And did you have any conversations with
11 Ms. Stewart pertaining to any of the
12 recommendations that were set forth in this
13 memorandum?

14 A. I don't have a specific recollection of
15 conversations I had with her, but our offices
16 were right next to each other, so I imagine I
17 did.

18 Q. But none that you recall?

19 A. None that jump out at me.

20 Q. Okay. Did you disagree with any of the
21 staff recommendations in this memorandum?

22 A. No, I did not. I thought -- well, I'll
23 just say no, I did not at this point.

24 Q. Okay. And what did you think? If you'd

1 round out your thought there.

2 A. You know, the first thing is I think you
3 gave me the staff report for the second version
4 of the application. The first version left a
5 lot to be desired. It wasn't very clear on many
6 aspects of the overall development. And while
7 they cleaned it up, you know, I think Mr. Brown
8 points out a number of areas where it's
9 deficient.

10 I'll go back to some comments I made
11 earlier. I never -- I didn't think it struck
12 the balance that the comprehensive plan update
13 contemplated between housing and housing types
14 and office and economic-generating activity and
15 meaningful park space. And the 2015 plan had
16 less density on --

17 MR. SCHUMACHER: You said plan, or
18 application?

19 A. well, they had a 2015 concept plan that,
20 you know, had many objections from the
21 community, and I'm sure were listening to the
22 volume of -- when we had a whole website section
23 on UMCH issues where we kept people updated and
24 people's opinions were available and there was

1 masses of comments and community dialogue and,
2 you know, narrative during the many ensuing
3 years between 2015 and when they ultimately
4 filed. And, you know, the public's concerns
5 about the balance of uses on the site weren't --
6 seemingly weren't considered because they got
7 more dense, probably less economically impactful
8 on less land following the subdivision off of
9 the West Ohio Conference. And didn't reflect, I
10 think, their best effort.

11 Q. Anything else?

12 A. Well, that's a broadbrush. I think
13 Mr. Brown does a very thorough job laying out
14 the staff's concerns on each aspect of the
15 comprehensive plan, and I've given you a broad,
16 general framework for what I thought, but I
17 thought he did a very good job looking at all
18 aspects of the comprehensive plan, fairly
19 pointing out where it's improved, and outlining
20 deficiencies that rise to the level of not
21 approving it.

22 Q. Okay. With your broadbrush answer, is
23 there anything else beyond the -- I wrote down
24 seven different things you've listed.

1 A. Well, no, I'm not going to offer any
2 more at this point. I think Mr. Brown's memo
3 does a good job of articulating the staff's
4 viewpoints on the application.

5 Q. Okay. I just want to make clear, I'm
6 asking is there anything else, and you're saying
7 you're not going to offer anything up beyond the
8 text of the memo itself. Is there anything that
9 you're leaving out, or are you just going to
10 stand on Mr. Brown's memo?

11 MR. SCHUMACHER: Objection.
12 Argumentative.

13 A. I am not leaving anything out that comes
14 to my mind.

15 Q. Thank you.

16 A. I reserve the right to share that with
17 my counsel if he so desires at some point.
18 However -- not my counsel, the City's counsel.
19 However, I will comment that I think Mr. Brown's
20 memo's thorough.

21 Q. And I'm just asking your understanding,
22 your thoughts with respect to the conclusions
23 set forth in Mr. Brown's memo. Okay? And I
24 just want to know what those are.

1 A. I think I gave them to you.

2 Q. All right. And so you said with respect
3 to Exhibit 1 --

4 MR. SCHUMACHER: Did you have more to
5 say? I'm sorry.

6 THE WITNESS: No. I think he did a good
7 job. I think he thoroughly outlined the -- I
8 think he did what the staff's job is, is to
9 review the plan and outline the issues
10 associated with it, and, you know, share our
11 thoughts on its deficiencies. And, you know, he
12 did that. I support what was written.

13 BY MR. INGRAM:

14 Q. Okay. Now, with respect to your
15 testimony regarding your opinion that the
16 application didn't strike a balance between the
17 land use plan set forth in Exhibit 1 with
18 respect to different housing types, what are you
19 referring to?

20 A. Well, bear with me.

21 Yeah, I think Mr. Brown's memo does a
22 better job of articulating than I can on --

23 Q. You're looking at a page. Can you --

24 A. Yeah. 003161. There's a conversation

1 about residential density height and housing
2 types and, you know, the plan, and that whole
3 housing section, you know, talks about some of
4 the issues associated with then housing.
5 Essentially that the density was too much and
6 also that the variety didn't respond to some of
7 the needs that became expressed by the community
8 over time.

9 Q. Okay. But you were referring to housing
10 types and density in connection with the land
11 use plan. Specifically where in the land use
12 plan does this application not strike the
13 appropriate balance? Because when I look at the
14 section you just directed me to, that's
15 comparing with the 2015 plan -- or 2015 concept
16 version, but doesn't refer to Exhibit 1.

17 A. How about we schedule a time when I
18 re-reviewed this and reviewed this and we can
19 have a debate about it. But I haven't -- I
20 would need to read the 2014 comprehensive plan.
21 You asked me for my off-the-cuff opinion, and I
22 gave it to you.

23 Q. Well, Mr. Greeson --

24 A. Bottom line is I think Mr. Brown's memo

1 is what I reviewed at the time, and I thought it
2 reflected that that was the staff's opinion at
3 the time, and that was my opinion at the time,
4 because I agreed with it. And the density in
5 particular is significantly different than it
6 was in 2015. I mean, wasn't sufficient office,
7 wasn't sufficient green space, and the density
8 exceeded what I think the community would have
9 supported and was appropriate under the plan.

10 Q. Okay. Couple things, Mr. Greeson.
11 Number one, I'm not here to argue or debate with
12 you. I'm here to understand --

13 MR. SCHUMACHER: Objection. I think you
14 are.

15 Q. I'm here to understand your personal
16 knowledge --

17 A. Yes.

18 Q. -- and your understanding of why you're
19 agreeing with Mr. Brown's conclusions in this
20 memorandum. And you provided me with -- I wrote
21 down seven different things.

22 A. Right.

23 Q. And the first four that I wrote down
24 related to -- all related to the land use plan

1 set forth in Exhibit 1.

2 A. Yes.

3 Q. And so now I want to ask follow-up
4 questions of why you -- what the basis was for
5 each one of --

6 A. Of those seven things?

7 Q. Correct.

8 MR. SCHUMACHER: Let me interpose.

9 A. This.

10 MR. SCHUMACHER: "This," he's referring
11 to Exhibit 38.

12 Let me interpose an objection as to the
13 argumentative nature of your question, and also
14 to the relevance of a witness who's not on City
15 Council who doesn't have decision-making
16 authority.

17 He's pointed you to the staff report,
18 Exhibit 38. He's told you to talk to Mr. Brown
19 about that in detail. He's giving you his
20 off-the-cuff. If you do want to argue with him
21 about that, there's a time and place for that,
22 and it's not in a deposition.

23 BY MR. INGRAM:

24 Q. Okay. Mr. Greeson --

1 A. Yes, sir.

2 Q. -- so with respect to the balance of
3 the types of housing and the density with the
4 land use plan, which balance or where in the
5 land use plan in Exhibit 1 were you referring
6 to --

7 MR. SCHUMACHER: Same --

8 Q. -- that the application failed to
9 achieve?

10 MR. SCHUMACHER: Same objection that I
11 just made.

12 A. So I would refer you to the staff memo,
13 and I would need to read that to cite the
14 specific sections, and then re-read this, but I
15 think the staff memo calls out fairly clearly
16 some of the deficiencies in the plan, in their
17 submittal. I'm not sure that I have any other
18 comments because I'm not prepared to go
19 scripture and verse between sections of the UMCH
20 focus area plan from 2014 and their submittal.

21 Q. And so what -- when you reference the
22 housing types or the density in connection with
23 the land use plan, what was -- what's that based
24 upon?

1 MR. SCHUMACHER: Objection.

2 A. I'm sorry, repeat your question.

3 Q. I'm just trying to understand or
4 ascertain the basis for your reference to the,
5 in your mind, insufficiency of housing types or
6 the density as it -- in Lifestyle's application
7 as it related to the land use plan in Exhibit 1.

8 MR. SCHUMACHER: Objection.

9 Argumentative.

10 A. All right. Bear with me. I'm going to
11 read.

12 Q. Take all the time you need.

13 MR. SCHUMACHER: Until 5:00.

14 Is there a question pending?

15 MR. INGRAM: Yes.

16 MR. SCHUMACHER: What was the question?
17 I'm sorry. I forgot.

18 (Record read as requested.)

19 MR. SCHUMACHER: Objection. You can
20 answer.

21 A. First, I'm not sure my opinion matters,
22 first of all. I'm no longer the city manager.
23 Second, the planning commission has the charter
24 duty to make the recommendation, and it's

1 ultimately a policy decision of the City
2 Council. The manager's role and Mr. Brown's
3 role would be to facilitate process, provide
4 technical information, which he does in his
5 memo, and give any insights that we might choose
6 to offer. However, we don't make policy. It's
7 ultimately the City Council's decision and the
8 planning commission's important charter role to
9 offer them their opinion.

10 However, to answer your question, I'll
11 go density and housing type. The density on the
12 site as was proposed was, I think, 600 units,
13 which was higher than the 2015 proposal with
14 less acreage. And that's not answering the
15 question you asked, but I'm offering it. And so
16 in that regard, I don't think that they listened
17 to the overwhelming outpouring of concern about
18 the density that was suggested in 2015 when they
19 drafted a proposal many years later with less
20 land.

21 Q. Mr. Greeson --

22 A. The second --

23 MR. SCHUMACHER: I don't think he's
24 done.

1 A. The second thing, which I think more
2 directly responds to your question, was the mix.
3 They proposed a mix of for-sale and for-rent
4 products throughout the site. I think
5 predominantly for rent. And the floor plan
6 options had few options for single-level living,
7 which is, as Mr. Brown outlines in his memo, one
8 of the things that we heard repetitively from
9 the community. The strategic analysis or the
10 adopted UMCH focus area amendment of the
11 comprehensive plan in 2014 has objectives that
12 are pretty clearly outlined, and that includes
13 addressing the needs of current and future
14 residents by providing new housing types,
15 options that are underrepresented in the market
16 and complements Worthington's current offerings.
17 And if you do any listening to the community,
18 you'll hear that people want to be able to stay
19 in this community and have opportunities for
20 single-level living. That's been expressed in
21 lots of different ways by the community over
22 time, and I think it was -- you know, that
23 different housing type that doesn't exist in our
24 market isn't offered.

1 I think, additionally -- bear with me.
2 I lost my place. In the neighborhood core
3 section of the land use plan, there's also
4 discussion about introducing residential living
5 that is underrepresented in the market and
6 complements Worthington's current offering,
7 addressing the needs of aging Worthington
8 residents -- I emphasize there -- future young
9 professionals, and those desiring amenity-rich
10 living. Perhaps you might need to hear that
11 again. Addressing the needs of aging
12 Worthington residents.

13 MR. SCHUMACHER: Do you want him to go
14 on? Chris, do you want him to continue?

15 BY MR. INGRAM:

16 Q. Are you finished answering?

17 A. Yes.

18 Q. And with respect to the for sale, for
19 rent residential house styles in Lifestyle's
20 application, how does that fall short or not fit
21 within the land use plan? Can you point me to
22 that?

23 MR. SCHUMACHER: Objection.

24 Argumentative. Do we have that plan here? I

1 don't think I have the plan.

2 MR. INGRAM: It's Exhibit 1.

3 MR. SCHUMACHER: I thought you were
4 referring to Lifestyle's plan and why it didn't
5 comport with Exhibit 1. What I'm saying is, I
6 don't think we have Lifestyle's plan in front of
7 us. And if you're asking the witness to compare
8 your client's deficient plan with the Exhibit 1
9 and with the staff memo Exhibit 38, then I think
10 we need to look at that. If we're going to
11 debate this case here and on deposition, that's
12 what we're going to have to do.

13 A. I don't think I outlined rental or for
14 rental as one of my opinions earlier. I just
15 cited that it was the fact that they had a mix
16 in their proposal. I don't have any comment on
17 that.

18 Q. Okay. It had written down for sale, for
19 rent as part of your response.

20 A. I was just reciting that out of
21 Mr. Brown's memo that their proposal included a
22 mix of those, and I commented that it was
23 predominantly for rent, but it was a mix of for
24 rent. I was just stating what I think are the

1 facts about their proposal based on what was in
2 Mr. Brown's memo. I wasn't commenting on this,
3 on the type of housing, or the -- whether it
4 was -- you could buy it or rent it.

5 Q. What new housing types in your mind were
6 missing?

7 MR. SCHUMACHER: Same objection as
8 before.

9 Go ahead.

10 A. Single-level living is among the others
11 and among -- is one of them. And then I would
12 have to review the proposal in more detail and
13 look at Mr. Brown's memo in more detail to
14 further answer the question.

15 Q. And then you repeated a reference to the
16 needs of aging residents with respect to the
17 neighborhood core.

18 A. Yes, sir.

19 Q. And what were you referring to there?

20 A. Single-level living, that we've heard in
21 the worthington community for many years.

22 Q. To your knowledge, did you or a member
23 of the city staff communicate any concern that
24 there was not enough single-story residential

1 products or housing, I should say, in their
2 application?

3 MR. SCHUMACHER: Go ahead.

4 THE WITNESS: I thought you were raising
5 your hand.

6 MR. SCHUMACHER: You did ask -- your
7 question related to staff, right?

8 MR. INGRAM: To Mr. Greeson or his
9 staff.

10 MR. SCHUMACHER: Right.

11 A. Yeah, I don't -- I didn't have a
12 specific -- when?

13 BY MR. INGRAM:

14 Q. With respect to the --

15 A. This application?

16 Q. -- the Lifestyle application. Yes.

17 A. I didn't have a specific conversation.
18 It's clear in the comprehensive plan, it's
19 clearly in the body of information that the
20 public, you know, advanced over time, and you
21 would have to ask other staff who interacted
22 with them more frequently what was commented on.

23 Q. Well, you interacted with Mr. Hart and
24 Mr. Brownlee, correct?

1 A. At the beginning of the process,
2 briefly.

3 Q. Okay. And you didn't communicate this
4 issue to either of them, correct?

5 A. I don't --

6 MR. SCHUMACHER: When? After this
7 application was filed?

8 MR. INGRAM: Yes.

9 MR. SCHUMACHER: Go ahead.

10 A. So let me go back to my role. I was not
11 managing the interaction with UMCH. You asked
12 my thoughts on their application. I gave them.
13 The official thoughts of staff on the
14 application are written in Mr. Brown's memo.
15 You asked my personal thoughts, and I gave them
16 to you. And the official recommendation is
17 right here. It's Exhibit 38. I did not have
18 much interaction with Mr. Hart or Mr. Brownlee
19 during the process. That was largely Mr. Brown,
20 to some degree Mr. Lindsey, and then before the
21 planning commission. But I think the
22 comprehensive plan is clear and their
23 application wasn't totally responsive to it.

24 Q. Okay. And with respect to the

1 comprehensive plan in Exhibit 1, in addition to
2 housing types, you referenced, in your personal
3 opinion, insufficient office space, lack of
4 meaningful park space, and less
5 economic-generating activity. Fair?

6 A. Yeah. I mean, go -- that sounds -- I'm
7 sure that's what I said.

8 Q. Well, I just want -- I want to make sure
9 that I understand what your concerns were and --
10 because my question is: Did you convey any of
11 those concerns with anyone from Lifestyle while
12 the application was pending?

13 MR. SCHUMACHER: Other than what was
14 expressed by staff and the planning commission?
15 You're asking him personally?

16 MR. INGRAM: Read back my question,
17 please.

18 THE WITNESS: I'm going to get some
19 water.

20 MR. SCHUMACHER: Can we go off the
21 record.

22 (A discussion is held off the record.)

23 (Record read as requested.)

24 A. The application in -- whenever it was,

1 2021, I did not have much interaction with
2 Lifestyle or Mr. Hart. I can't recall that I
3 specifically communicated that. We were
4 encouraging and open, iterative process before
5 the planning commission. So I was being -- I
6 also didn't want to unfairly interject myself in
7 a process that I thought should be -- you know,
8 would build trust in the community if it was,
9 you know, happening before the planning
10 commission. So no.

11 Q. Okay.

12 A. I was not a part of all of the
13 conversations that occurred with them.

14 Q. In preparation for your deposition
15 today, you had reviewed the meeting minutes from
16 the planning commission hearing on this
17 application. Do you recall that?

18 A. I do.

19 Q. And do you recall that the commission
20 prevented Lifestyle from amending its
21 application?

22 A. In the sense -- no, they didn't. They
23 did amend their application, but only once. I
24 mean, they had an application. It was poorly

1 constructed. They had many months to bring back
2 to the planning commission ideas, iterative
3 changes, or concepts for the planning commission
4 to react to. I think Mr. Brown regularly
5 communicated with them to see if they had any
6 updates, because we were committed to making
7 sure that we were timely, that we got it before
8 the planning commission, and that we were
9 administering the process. They took -- again,
10 they went relatively dark for a long period of
11 time, and then came back with a proposal that
12 was their one amendment.

13 Q. Did --

14 MR. SCHUMACHER: Are you done?

15 THE WITNESS: Yeah.

16 Q. Mr. Greeson, did you attend that
17 planning commission hearing?

18 MR. SCHUMACHER: Which one?

19 Q. The October 14, 2021, hearing.

20 A. You know, I read the minutes. I don't
21 remember. I think I listened in. I would have
22 to go back and look.

23 Q. You don't recall one way or the other?

24 A. No. And I didn't pay attention in the

1 minutes of whether I was there or not.

2 MR. SCHUMACHER: It was virtual. Just
3 point of clarification.

4 Q. Do you recall whether you attended
5 virtually?

6 A. I don't recall.

7 Q. And you just mentioned that you
8 thought --

9 A. Busy time.

10 Q. -- Mr. Brown was regularly
11 communicating with Lifestyle. Do you know that,
12 or are you speculating?

13 A. No, I know that he was reaching out at
14 least monthly to see if they had any updates.

15 Q. And how do you know that?

16 A. Because Mr. Brown reported to us.

17 Q. And how did Mr. Brown report to you?

18 A. I don't recall specifically. It was
19 probably verbally.

20 Q. Would there be emails or notes from
21 those conversations?

22 A. With me, between Mr. Brown and me?

23 Q. Yes.

24 A. Probably not. I do not have any, I

1 should say.

2 Q. Okay. Was there a file concerning this
3 application where there would be documentation
4 between the interactions of Mr. Brown and
5 Lifestyle's representatives?

6 A. I don't know.

7 Q. Can you recall any specific times when
8 Mr. Brown updated you with his conversations
9 with Lifestyle's representatives?

10 A. Not specifically.

11 Q. I've handed you, Mr. Greeson, what was
12 previously marked as Exhibit 6?

13 A. Yes.

14 Q. Which is Ordinance No. 4-2022.

15 A. Okay.

16 Q. You've reviewed Exhibit 6?

17 A. (Nods head.)

18 Q. Do you recall this moratorium ordinance?

19 A. Yes.

20 Q. Who was involved in drafting the
21 moratorium ordinance concerning the UMCH
22 property?

23 A. The law director was the -- wrote it. I
24 looked at it. I believe Mr. Brown looked at it.

1 I may have -- I may be wrong about that. My
2 memory may be faded on that. But both
3 Mr. Lindsey and I were involved in it.

4 Q. Okay. And who originally proposed this
5 ordinance to you?

6 MR. SCHUMACHER: Objection. Relevance.
7 You can answer.

8 A. Who requested it? Is that what you're
9 asking?

10 Q. Yeah, that's a more artful way of
11 stating it.

12 A. Council President Robinson.

13 Q. And when did Council President Robinson
14 request that this ordinance be prepared?

15 A. I don't recall the specific time or
16 date. It was early in his tenure as council
17 president.

18 Q. So this ordinance was proposed and voted
19 upon at City Council's January 18, 2022,
20 meeting.

21 A. Right. It was not -- I'm sorry. Repeat
22 the date. January --

23 Q. January 18, 2022.

24 A. Right. So it would have been between --

1 you know, in the week or so prior to that.

2 Q. Okay. And this ordinance or proposed
3 ordinance was not on City Council's agenda. Do
4 you recall that?

5 A. Yes, I do.

6 Q. And do you know why this proposed
7 ordinance was not included on the agenda?

8 A. Well, it wasn't done, for one, and I am
9 not sure it was finally -- when the agenda went
10 out the door, I'm not sure it was finally
11 concluded it was going on. And I don't think
12 its content was completed until close to the
13 meeting. I don't remember how close to the
14 meeting, but fairly close to the meeting.

15 Q. So at this time, Councilmember Robinson
16 had become the City Council president?

17 A. Correct.

18 Q. In January of 2022. So he's a brand-new
19 president?

20 A. Correct.

21 Q. And we'll call it the second week of
22 January or third week of January he approaches
23 you and Mr. Lindsey and requests that this
24 moratorium be prepared; is that fair?

1 A. Sometime in that time frame.

2 Q. Okay. And did you communicate
3 Mr. Robinson's request that a moratorium be
4 prepared with respect to the UMCH property to
5 any other councilmembers?

6 A. At some point in the process between his
7 request, our decision to prepare it and the
8 council voting on it, I spoke with each of the
9 councilmembers to inform them that we had
10 received this request and that it was coming and
11 that we were working on it.

12 Q. How far in advance did you speak with
13 each member of council to the January 18th
14 meeting?

15 A. Not -- I mean, again, we did not have it
16 complete, so I don't recall specifically. It
17 was late in the week and over the weekend
18 probably. I don't have a -- I don't have a
19 specific timeline that I recall.

20 Q. Okay. And that meeting was on a
21 Tuesday, Tuesday evening.

22 A. All right.

23 Q. And so to the best of your recollection,
24 you spoke with each member of council over the

1 preceding weekend or late the week before; is
2 that fair?

3 A. Yeah, and it could have been as late as
4 Monday. I don't remember.

5 Q. So each member of council knew that
6 this -- that a moratorium would be proposed on
7 the UMCH site?

8 MR. SCHUMACHER: Objection. He didn't
9 say that.

10 A. That it was being prepared and that
11 there was a likelihood that it was going to be
12 proposed.

13 Q. Okay.

14 A. Staff was not proposing it.

15 Q. Of course.

16 Did you talk to any city staff about
17 this proposed moratorium prior to the hearing?

18 A. I likely did. I don't recall having --
19 who I talked to other than Mr. Lindsey. I may
20 have talked some to Mr. Brown, although he was
21 not heavily involved in the dialogue about this.
22 Ms. Stewart may have been aware of it, but I
23 don't recall involving her. I don't have a lot
24 of memory around other than Mr. Lindsey and I.

1 Q. Did you notify anyone from Lifestyle
2 about this proposal in advance of the hearing?

3 A. I did not, although they were at the
4 hearing. Representatives of Lifestyle,
5 Mr. Miller, I believe, was at the meeting.

6 Q. So you're referring to the February 7th
7 meeting, the following meeting.

8 A. Okay. That might be the case. It's
9 been a long time.

10 Q. I understand.

11 MR. SCHUMACHER: It was a public
12 meeting, so anybody can come, even those who
13 live on Gay Street.

14 A. No, I did not at the time contact
15 anybody in Lifestyle.

16 Q. Just to be clear, the Ordinance 4-2022
17 was heard and voted upon during the January 18,
18 2022, hearing, and then there was --

19 MR. SCHUMACHER: What was the result?

20 Q. -- there was a February 7, 2022,
21 hearing, a discussion item, UMCH focus area
22 moratorium. I have the agenda here if you'd --

23 MR. SCHUMACHER: Is that marked already?

24 MR. INGRAM: Yeah.

1 MR. SCHUMACHER: Which one was it?

2 MR. INGRAM: Exhibit 13.

3 MR. SCHUMACHER: Thank you.

4 BY MR. INGRAM:

5 Q. -- to refresh your recollection,
6 Mr. Greeson.

7 A. Thank you.

8 MR. SCHUMACHER: That was marked during
9 the prior deposition, not today.

10 A. Further discussion.

11 Q. Does that refresh your recollection as
12 to the sequence of events?

13 A. Somewhat. There's been a lot that's
14 happened since then.

15 Q. Okay.

16 MR. SCHUMACHER: Well, what's the
17 question, whether Mr. Miller was at the February
18 7th meeting, or the January 18th meeting?

19 MR. INGRAM: That's not the question at
20 all. He indicated he was confused, and so I was
21 just reminding him of the sequence of events
22 with the two hearings.

23 MR. SCHUMACHER: I thought he said that
24 Mr. Miller was at the January 18th meeting, and

1 your questions were designed to -- what, to
2 clear up that confusion?

3 MR. INGRAM: Yes.

4 MR. SCHUMACHER: Thank you.

5 MR. INGRAM: Just to clear up the
6 record.

7 MR. SILK: So it was the question.

8 MR. SCHUMACHER: All right.

9 BY MR. INGRAM:

10 Q. And so my prior question, Mr. Greeson,
11 was whether you had shared the moratorium
12 pertaining to the UMCH property, the proposal,
13 with anyone from Lifestyle prior to the January
14 12th hearing. You said you did not. Are you
15 aware of anyone else from the city sharing this
16 proposed ordinance with anyone from Lifestyle
17 prior to that hearing?

18 A. I'm not.

19 Q. Were you asked by anyone not to share
20 this proposed moratorium with anyone from
21 Lifestyle?

22 A. I don't recall specifically whether I
23 received a direct ask to do that.

24 Q. What do you recall?

1 A. That we discussed -- there was some
2 discussion about, you know -- I don't have a
3 vivid memory of it, but there was some
4 discussion about, you know, when this should be
5 shared, but I don't have a specific memory of
6 it.

7 Q. Okay. And was that --

8 A. It would have been dialogue between
9 Mr. Robinson, Mr. Lindsey and I.

10 Q. So there was a discussion involving you
11 and Mr. Lindsey and President Robinson
12 concerning when this proposed moratorium should
13 be shared; is that fair?

14 MR. SCHUMACHER: Objection to the extent
15 that this invades the City's attorney-client
16 privilege.

17 A. I don't know about when. Maybe whether.
18 But I don't have a specific memory of it. I
19 didn't share it, so clearly I concluded that we
20 shouldn't, or that I shouldn't.

21 Q. Okay.

22 A. So -- I don't have anything else to add.

23 Q. Was the fact that a moratorium on the
24 development of the -- of LC's property is going

1 to be discussed during the January 18 hearing --
2 City Council hearing -- a citizen testified at
3 that hearing because he had heard about it in
4 the community.

5 A. Okay.

6 Q. Did you share this proposal or in any
7 way tell anyone else about this proposed
8 moratorium in advance of that meeting?

9 A. Beyond council and staff, no.

10 Q. Are you aware of any staff members
11 sharing the proposed moratorium with anyone in
12 the public?

13 A. I'm not aware, and don't recall at this
14 point.

15 Q. I'm handing you what was previously
16 marked as Exhibit 7, which was Resolution
17 No. 4-2022. Have you had a chance to review
18 Exhibit 7?

19 A. Yes.

20 Q. Very similar questions on this
21 resolution as I had on the prior ordinance.

22 A. Yes.

23 Q. You can see here from the face of
24 Exhibit 7, Resolution No. 4-2022 was adopted by

1 City Council on January 18, 2022. Do you see
2 that?

3 A. Yes.

4 Q. And do you recall that this resolution
5 was not on City Council's agenda for that
6 hearing? Do you recall that?

7 A. Yes.

8 Q. Who drafted Resolution No. 4-2022?

9 A. I don't recall. I can only assume that
10 our law director did, but I don't specifically
11 recall who drafted the resolution.

12 Q. So you don't know one way or the other?

13 A. I don't -- no, I don't remember.

14 Q. Okay.

15 A. These kind of cover resolutions are
16 usually drafted by staff, but they're -- I don't
17 recall specifically.

18 Q. Were you involved in drafting this
19 resolution in Exhibit 7?

20 A. I don't believe so.

21 Q. And then with respect to the amendment
22 to the comprehensive plan update that's attached
23 to the resolution, that would be pages 2 and 3
24 of Exhibit 7, were you involved at all in

1 drafting that comprehensive plan update?

2 A. Let me go back and say I don't recall on
3 the resolution.

4 Q. Okay.

5 A. Let's me clarify my answer. I don't
6 recall whether I reviewed it, because I don't
7 recall. I was not involved in drafting the --
8 what did you describe this as?

9 Q. The --

10 MR. SCHUMACHER: Page 2 and 3.

11 Q. The comprehensive plan update, or the
12 amendment to it.

13 A. No, I was not involved in drafting it.

14 Q. It would be helpful if it had a title.

15 A. Yeah.

16 Q. Okay. Do you know who did?

17 A. I believe it was -- I believe it was
18 drafted by Mr. Robinson.

19 Q. And why do you believe that?

20 A. He is the one that transmitted it to the
21 City Council. I'm not aware of anybody else
22 being involved.

23 Q. Did Mr. Robinson --

24 A. I should say I don't remember anybody

1 else being involved.

2 Q. With respect to this amendment to the
3 comprehensive plan, did you provide Mr. Robinson
4 with any specific information that was
5 incorporated or adopted into this amendment?

6 A. No, I did not. I wrote that memo in the
7 early part of -- whatever year it was, that
8 certainly said that amending the comprehensive
9 plan was one strategic approach to reshape
10 policy direction related to UMCH. I also wrote
11 in that memo that the moratorium was a legal
12 policy option available to the city. But I
13 didn't influence or shape this. It's possible
14 that he sent this -- he did send this at some
15 point early in the day of the hearing out to
16 council, and he may have sent it earlier than he
17 sent it to council to staff. I didn't make any
18 comment on it. I don't know whether Mr. Lindsey
19 or Mr. Brown did. I don't recall. That
20 clarifies my earlier answer about whether
21 anybody else was -- touched this.

22 Q. Okay. So it's not like any city
23 consultants or anyone from the city assisted
24 Mr. Robinson, to your knowledge, to prepare or

1 create this amendment to the City's
2 comprehensive plan?

3 A. I think, if staff made any comment on
4 it, it was reacting to the draft the day of the
5 meeting.

6 Q. And did any --

7 A. But I don't remember specific changes to
8 it that we influenced or having an opportunity
9 to substantively review it and impact it.

10 Q. Did any of the city staff consult with
11 you regarding any proposed revisions or changes
12 to --

13 A. Not that I can remember. They can tell
14 you if they did or not. I don't remember.

15 Q. And similar to my questions with respect
16 to Exhibit 6, with Exhibit 7, did you share this
17 amendment to the comprehensive plan that
18 pertained to Lifestyle's property with
19 Lifestyles before the January 18 hearing?

20 A. No. I mean, I didn't get it until
21 January 18th, so I -- no, I did not.

22 Q. Did you know, prior to January 18th,
23 that Council President Robinson had any
24 intention of amending the comprehensive plan as

1 it pertained to the UMCH property?

2 A. I think you can look at the record from
3 years prior and know that this was a --
4 something that he desired to do at some
5 juncture.

6 Q. Sorry. That was an inartful question.
7 I intended to ask this specific revision that's
8 contained in Exhibit 7, did you have any
9 indication --

10 A. Right.

11 Q. -- that Mr. Robinson was going to move
12 forward with this prior to the January 18
13 hearing?

14 A. I cannot -- I honestly can't recall our
15 specific conversations kind of on the heels of a
16 moratorium and whether -- what he told me about
17 this. I don't recall.

18 Q. And similar question, are you aware of
19 any indications or conversations President
20 Robinson would have had with any other city
21 staff concerning this comprehensive plan
22 amendment set forth in Exhibit 7?

23 A. Not that I can recall or remember.

24 Q. Were you directed or instructed by

1 Council President Robinson not to share the
2 contents of Exhibit 7 with anyone outside of the
3 city?

4 A. I don't think so. No, I don't recall
5 that. I don't remember him -- there was not a
6 lot of time between when I got it and when, you
7 know, council got it and all of that. No, I
8 don't remember that.

9 Q. Have you come to understand whether
10 Council President Robinson shared the contents
11 of Exhibit 7 with any other councilmembers prior
12 to January 18?

13 A. I don't know the answer to that.

14 Q. Do you know whether President Robinson
15 shared the contents of Exhibit 7 with anyone
16 outside of the city prior to the hearing?

17 A. I don't know the answer to that.

18 Q. In your time as city manager, has there
19 ever been a moratorium directed to a specific
20 property in the city?

21 A. I can't remember one. We've had other
22 moratoriums. Not that I can remember.

23 Q. Any moratorium directed to one property,
24 is my question?

1 MR. SCHUMACHER: You mean one that
2 passed?

3 A. Well, right, this one -- yeah, probably
4 important to say for the record that this one
5 did not pass, which requires a super majority.

6 No. I mean, there was a property on
7 Olentangy River Road that certainly was the
8 impetus for a moratorium in the Olentangy River
9 Road overlay, which resulted in the Olentangy
10 River Road overlay, and really there was only
11 one developable -- well, one vacant property out
12 there that stimulated that moratorium and the
13 work to create that overlay. But I don't have a
14 memory of any other like that.

15 Q. When did that occur?

16 A. I think that was like -- that was --
17 might have even been before I got here because
18 it was being worked on when I got here. So '07
19 sometime. 2007.

20 Q. So you were not involved in the
21 Olentangy overlay?

22 A. I was involved in it on the end of it.

23 Q. But with respect to whether or not there
24 was a moratorium --

1 A. I don't remember being involved in it,
2 no.

3 Q. Do you know whether, in fact, the
4 moratorium was passed in connection with the
5 olentangy overlay?

6 A. There was a moratorium for a period of
7 time.

8 Q. And I know you said the overlay -- there
9 was one developable piece, but there was more
10 than one property involved, correct?

11 A. In that instance, yes. I believe so. I
12 don't actually recall the details of it. It's
13 just a -- there was one property that was
14 driving it.

15 Q. But you don't recall the details?

16 A. No.

17 Q. Okay.

18 A. That one was 2007; so...

19 Q. In your time as the city manager at the
20 City of Worthington following the January 18,
21 2022, meeting, has the city considered the
22 future development of the UMCH property?

23 A. In what way?

24 Q. So, for example, with the amendment to

1 the comprehensive plan there in Exhibit 7, has
2 the city considered reviewing or updating
3 Exhibit 7?

4 A. So you would be talking --

5 MR. SCHUMACHER: Go ahead.

6 THE WITNESS: You raised your hand.

7 MR. SCHUMACHER: No, my hand's getting
8 sore from my pen.

9 A. So I left in December, early December of
10 2022. So you're talking about in the roughly 11
11 months I worked for the city before I left?

12 Q. Yes.

13 A. Repeat your question. Or could you
14 repeat the question?

15 Q. I can rephrase the question now that we
16 have a time frame.

17 A. Yeah.

18 Q. And really, I want to know whether the
19 city considered the future development of the
20 UMCH property, were there discussions about that
21 during that time frame?

22 MR. SCHUMACHER: From January 18th,
23 2022, until -- when was it -- December --

24 MR. INGRAM: Until he left.

1 MR. SCHUMACHER: Remember, the lawsuit
2 was filed in, I believe, March of '22.

3 A. Yeah, I don't think -- not that I can
4 recall.

5 Q. Okay.

6 MR. SCHUMACHER: Chris, I'm interposing
7 an objection to the extent that it would include
8 any Rule 408 discussions we've had since the
9 lawsuit was filed.

10 MR. INGRAM: Again, I'm not asking about
11 that.

12 MR. SCHUMACHER: Okay.

13 MR. INGRAM: You have a puzzled look on
14 your face, Mr. Greeson.

15 MR. SCHUMACHER: Is there a question
16 pending?

17 MR. INGRAM: He hasn't finished his
18 answer.

19 MR. SCHUMACHER: Okay.

20 A. So earlier in my engagement I told -- in
21 this whole dialogue I said there was some
22 outreach by Mr. Robinson to Mr. Brownlee
23 regarding the property in early 2022. That may
24 have happened -- I think that happened after the

1 adoption of this amendment, but I don't think it
2 resulted in any substantive conversation.

3 Q. And I believe you testified you were not
4 party to that discussion and weren't really
5 aware of what they discussed, correct?

6 A. I don't recall being a party to it. I
7 don't recall, you know -- I just recall nothing
8 happened. And then the lawsuit was subsequently
9 followed. So my puzzled look was because I was
10 trying to remember the sequence of events in
11 Mr. Robinson's outreach to Mr. Brownlee.

12 MR. INGRAM: Okay, Mr. Greeson, thank
13 you very much for your time today. The city
14 still has not yet exhausted its production of
15 documents to us. And so to the extent there is
16 any additional information produced, we may have
17 more questions for you. So I'm going to leave
18 your deposition open. But I have no further
19 questions for you today.

20 THE WITNESS: Thank you.

21 --O--

22 Thereupon, the testimony of October 6,
23 2023, was concluded at 5:07 p.m.

24 --O--

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

CERTIFICATE

STATE OF OHIO :
SS:
COUNTY OF FRANKLIN :

I, Rhonda Lawrence, a stenographic court reporter and notary public in and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within-named MATTHEW GREESON was first duly sworn to testify to the truth, the whole truth, and nothing but the truth in the cause aforesaid; that the testimony then given was taken down by me stenographically in the presence of said witness, afterwards transcribed; that the foregoing is a true and correct transcript of the testimony; that this deposition was taken at the time and place in the foregoing caption specified.

I certify that I am not a relative or employee of any attorney or counsel employed by the parties hereto and that I am not financially interested in the action. I further certify review of the transcript was not requested.

In witness whereof, I have hereunto set my hand at Columbus, Ohio, on this 20th day of October, 2023.

Rhonda Lawrence
Rhonda Lawrence
Notary Public, State of Ohio

My commission expires: October 9, 2028

<div>Exhibits</div> <div>Exhibit 1 65:9,11 183:13 185:9 204:2,4, 10 217:3,17 218:16 220:1 221:5 222:7 226:2,5,8 230:1</div> <div>Exhibit 6 234:12,16 247:16</div> <div>Exhibit 7 243:16,18, 24 244:19,24 247:16 248:8,22 249:2,11,15 252:1,3</div> <div>Exhibit 14 30:23 31:5, 7,9 38:22</div> <div>Exhibit 15 39:20,24 40:1</div> <div>Exhibit 16 48:8,12,13</div> <div>Exhibit 17 51:15,19, 20 53:4</div> <div>Exhibit 18 54:19,23</div> <div>Exhibit 19 55:23 56:3</div> <div>Exhibit 20 60:9,17,22 66:6,7</div> <div>Exhibit 21 68:7,11</div> <div>Exhibit 22 68:11 71:6, 10</div> <div>Exhibit 23 75:20 86:23</div> <div>Exhibit 24 75:24 76:16,17 79:6 83:17 88:23 89:3,11,12,19 90:8,15</div> <div>Exhibit 25 90:23 91:4 98:16</div> <div>Exhibit 26 96:24 97:4, 14 98:5,11 99:12</div> <div>Exhibit 27 100:12,16 101:8,19 103:20 105:5,6,18 108:19,20, 23 110:10 122:12 184:7,10,20</div> <div>Exhibit 28 134:9,13, 14,19 135:6,21 136:23</div> <div>Exhibit 29 141:20,24</div>	<div>142:6,7</div> <div>Exhibit 30 145:7,21 151:9 160:14 162:11</div> <div>Exhibit 31 166:11,15 167:4</div> <div>Exhibit 32 169:20 170:3,9,10,14 172:7 177:9 179:13</div> <div>Exhibit 33 180:11,22 181:4,12,13,24</div> <div>Exhibit 34 185:18,22, 24 186:17 187:1</div> <div>Exhibit 35 190:6,17 191:6,7 196:9 197:13, 14</div> <div>Exhibit 36 195:14,18, 21 196:21 197:22</div> <div>Exhibit 37 200:20,24 201:5,6,24 207:15,16, 20</div> <div>Exhibit 38 209:6,13, 18,24 211:9,10,24 220:11,18 226:9 229:17</div> <div>\$</div> <div>\$3.1 72:2</div> <div>\$41,000 52:18</div> <div>\$41,460 52:10</div> <div>-</div> <div>-=0=- 30:22,24 39:19, 21 48:7,9 51:14,16 54:18,20 55:22,24 60:8,10 68:6,8 71:5,7 75:19,21 88:22,24 90:22,24 96:23 97:1 100:11,13 134:8,10 141:19,21 145:6,8 166:10,12 169:19,21 180:10,12 185:17,19 190:5,7 195:13,15 200:19,21 209:5,7</div> <div>-=O=- 124:20,23 125:4 254:21,24</div>	<div>0</div> <div>003161 217:24</div> <div>05 205:23</div> <div>07 250:18</div> <div>1</div> <div>1 58:9 65:9,11 183:13 185:9 204:2,4,10 217:3,17 218:16 220:1 221:5 222:7 226:2,5,8 230:1</div> <div>10 183:22 185:2</div> <div>100 63:4</div> <div>1033 26:13 36:1</div> <div>10th 206:10</div> <div>11 31:11 252:10</div> <div>12 13:19,23 51:21</div> <div>126963 170:10</div> <div>126990 170:11</div> <div>12:25 123:24</div> <div>12:26 124:22</div> <div>12th 241:14</div> <div>13 201:1 206:7 240:2</div> <div>14 30:23 31:1,2,5,7,9 38:22 195:4 232:19</div> <div>15 10:3 15:17 39:20,24 40:1</div> <div>16 48:8,12,13</div> <div>17 51:15,19,20 53:4</div> <div>18 54:19,23 89:4 162:12,21 235:19,23 239:17 243:1 244:1 247:19 248:12 249:12 251:20</div> <div>1803 50:10</div> <div>18th 164:24 237:13 240:18,24 247:21,22 252:22</div> <div>19 55:23 56:3 97:17 142:2,15 171:18</div>	<div>1:20 125:3</div> <div>2</div> <div>2 56:13 183:19 186:24 196:21 244:23 245:10</div> <div>20 60:9,17,22 66:7 171:9 186:22</div> <div>2005 28:10,23 34:24 35:12 43:12</div> <div>2007 10:6,10 27:23,24 28:5,13 122:9 250:19 251:18</div> <div>2008 123:9</div> <div>2012 31:11,20 32:7 38:10 39:8 40:3 41:19</div> <div>2013 51:21 55:14 56:4 57:7 59:19</div> <div>2014 41:6 51:10 52:14 60:19,24 61:5 64:10, 12 65:6,7 66:2,6,8,14 67:14,19 88:13 152:21 155:16 183:11,24 186:5 205:18,23 208:13,22 218:20 221:20 224:11</div> <div>2015 68:19,22 71:12 87:3 120:22 125:12 139:15 159:24 178:18 194:5,10 200:1 214:15,19 215:3 218:15 219:6 223:13, 18</div> <div>2016 76:1 86:7,23 97:17 136:17 137:11 139:11,22</div> <div>2017 181:19 182:2,13</div> <div>2018 89:4 100:18 101:17 108:18 125:19, 22 127:19,20 132:15 134:21 137:12 139:11 142:2,15 146:20 161:9 162:4 164:20 166:16 171:16 174:3 181:2,20 182:17 184:2,7</div> <div>2018-2022 131:2</div> <div>2019 146:20 162:12,21 165:1 170:5 202:7</div>
---	--	--	--

<p>2020 70:22 91:7 146:2 151:16 152:20 159:18 186:2,22 190:19 195:24 201:2 206:7,14 207:24</p> <p>2021 12:7 209:14 231:1 232:19</p> <p>2022 10:8,10 125:19, 22 126:14,19 235:19, 23 236:18 239:18,20 244:1 251:21 252:10, 23 253:23</p> <p>2023 31:20 125:1 254:23</p> <p>21 68:7,11</p> <p>21st 40:3 186:2</p> <p>22 68:11 71:6,10 127:19,20 132:15 253:2</p> <p>22nd 170:4</p> <p>23 75:20 86:23</p> <p>23rd 61:4 76:1</p> <p>24 75:24 76:17 79:6 83:17 88:23 89:3,11, 12,19 90:8,15 190:19 199:1 202:7</p> <p>25 90:23 91:4 98:16</p> <p>26 96:24 97:4,14 98:2, 3,5,11 99:12</p> <p>27 56:4 100:12,16 101:8,19 103:20 105:6,18 108:20,23 110:10 122:12 166:16 184:7,10,20</p> <p>270 150:12</p> <p>28 134:9,13,14,19,21 135:6,21 136:23</p> <p>28377 68:14</p> <p>28380 68:15</p> <p>28381 40:1</p> <p>28382 40:1</p> <p>28538 56:5</p> <p>28539 56:5</p> <p>29 141:20,24 142:7</p>	<p>195:24</p> <p>2nd 66:1 100:18 181:2</p> <hr/> <p>3</p> <hr/> <p>3 108:21 109:9 110:11 122:12 153:10,16 181:3,23 244:23 245:10</p> <p>30 71:12 145:7,18,21 151:9 160:14 162:4,11</p> <p>30,000 97:24 98:18</p> <p>30th 161:9 164:20</p> <p>31 166:11,15 167:4</p> <p>3135 209:15</p> <p>3171 209:15</p> <p>317901 48:14</p> <p>31st 91:7 151:16 182:2</p> <p>32 169:20 170:3,10,14 172:7 177:9 179:13</p> <p>33 180:11,22 181:4,13, 24</p> <p>34 185:18,22,24 186:17 187:1 191:20</p> <p>35 161:4,5 162:1 190:6,17 191:7 196:9 197:14</p> <p>36 195:14,18,21 196:21 197:22</p> <p>36387 31:8</p> <p>37 95:8 200:20,24 201:6,24 207:16,20</p> <p>37.6 26:14</p> <p>38 77:22 209:6,13,18, 24 211:10,24 220:11, 18 226:9 229:17</p> <hr/> <p>4</p> <hr/> <p>4 55:13 68:19</p> <p>4-2022 234:14 239:16 243:17,24 244:8</p> <p>40-something 95:7</p>	<p>408 253:8</p> <hr/> <p>5</p> <hr/> <p>5 60:19 90:1,14</p> <p>55122 100:19</p> <p>55159 100:19</p> <p>57946 142:3</p> <p>57948 142:3</p> <p>58301 146:3</p> <p>5835 161:3</p> <p>58364 151:11,12</p> <p>58367 146:3</p> <p>58372 201:6</p> <p>58376 201:7</p> <p>58435 134:22</p> <p>58457 136:23</p> <p>58463 134:23</p> <p>5:00 124:9,13,15 145:17 222:13</p> <p>5:07 254:23</p> <p>5th 64:11 206:14</p> <hr/> <p>6</p> <hr/> <p>6 125:1 234:12,16 247:16 254:22</p> <p>600 223:12</p> <p>62382 51:22</p> <p>62390 53:15</p> <p>62392 51:22</p> <p>62713 55:2</p> <p>64 151:11</p> <hr/> <p>7</p> <hr/> <p>7 52:8 239:20 243:16, 18,24 244:19,24 247:16 248:8,22 249:2,11,15 252:1,3</p> <p>70 44:8</p>	<p>70s 51:7</p> <p>75 44:7</p> <p>76 201:7</p> <p>7th 239:6 240:18</p> <hr/> <p>8</p> <hr/> <p>8 52:1,2 182:17 209:14</p> <p>8-24 77:1</p> <hr/> <p>9</p> <hr/> <p>9 146:2 183:21 185:1</p> <p>90 53:16</p> <p>91 53:17</p> <p>999,000 201:9</p> <hr/> <p>A</p> <hr/> <p>abiding 21:23</p> <p>ability 9:14 34:7 83:11 119:13 164:6 175:5</p> <p>absorb 86:13</p> <p>accept 25:9</p> <p>Accepted 122:19</p> <p>accepting 18:4</p> <p>access 63:6</p> <p>accessible 108:15</p> <p>accommodate 51:7</p> <p>accompanying 106:13</p> <p>accomplish 73:9 80:18</p> <p>accomplishing 80:20</p> <p>accurate 8:22 9:5 43:5,20 64:12 98:16 183:6</p> <p>accurately 112:20 113:21</p> <p>achieve 64:22 221:9</p> <p>acknowledges 112:12</p>
---	---	---	---

<p>acquire 68:4 72:14 73:9 125:9 128:19 130:20 131:5</p> <p>acquiring 63:21 74:7, 15</p> <p>acquisition 63:23 64:3,7,16 65:2 67:2,23 73:23,24 121:24 126:9,10,13 127:11 128:2,10,12 129:8,22 133:21 163:1</p> <p>acreage 27:10 95:10 223:14</p> <p>acres 26:14 90:1,14 95:7</p> <p>acronym 56:17</p> <p>act 187:8</p> <p>acted 66:12 132:8</p> <p>acting 13:9,17,22</p> <p>action 192:16</p> <p>actions 21:24 73:22</p> <p>active 39:13,14 63:23</p> <p>actively 126:12</p> <p>activity 58:7 119:11, 19 214:14 230:5</p> <p>actual 98:14 165:2</p> <p>acute 150:6</p> <p>Adam 166:17</p> <p>add 117:15,17 198:22 242:22</p> <p>addition 230:1</p> <p>additional 52:13 79:2 80:9 103:22 113:14 175:17,19 254:16</p> <p>additionally 158:4 225:1</p> <p>additive 114:24 115:10</p> <p>address 44:4 71:18, 19</p> <p>addressed 79:17</p> <p>addressing 73:14 224:13 225:7,11</p>	<p>administer 18:7</p> <p>administering 20:3,4 232:9</p> <p>administration 15:8 19:23 70:15</p> <p>adopt 16:19</p> <p>adopted 29:21 41:5 47:3 51:3 66:1,5 88:13 122:17,18 123:17 202:16 203:9,11 224:10 243:24 246:5</p> <p>adopting 66:9</p> <p>adoption 254:1</p> <p>advance 16:24 237:12 239:2 243:8</p> <p>advanced 228:20</p> <p>advancing 58:6 155:21 158:22</p> <p>advertised 108:16</p> <p>advised 188:8</p> <p>advisors 128:23</p> <p>advisory 61:11</p> <p>affecting 9:11 199:9</p> <p>AFTERNOON 125:2</p> <p>agencies 37:17</p> <p>agenda 95:23 106:12, 13,15 107:19 182:16 184:2 188:15,22,24 189:4,6,10,14 212:17 236:3,7,9 239:22 244:5</p> <p>aggressively 126:12</p> <p>aging 225:7,11 227:16</p> <p>agree 58:16,22 83:21 169:18</p> <p>agreed 219:4</p> <p>agreeing 219:19</p> <p>agreement 155:2 180:5</p> <p>ahead 40:14 49:23 59:7 82:11 87:12 99:16 131:8 157:6,8 201:21 202:24 227:9</p>	<p>228:3 229:9 252:5</p> <p>aimed 138:18 139:9</p> <p>aiming 45:3</p> <p>aligned 204:22</p> <p>all-inclusive 69:14</p> <p>Alliance 56:17</p> <p>allocate 16:22</p> <p>allocation 175:15</p> <p>alternative 159:10</p> <p>amend 77:22 152:21 206:22,24 208:24 231:23</p> <p>amended 155:5</p> <p>amending 153:2 189:21 208:4,11 231:20 246:8 247:24</p> <p>amendment 78:2 88:14 152:22 183:11 208:16 224:10 232:12 244:21 245:12 246:2,5 247:1,17 248:22 251:24 254:1</p> <p>amendments 207:11</p> <p>amenities 68:3 117:19 119:13</p> <p>amenity-rich 225:9</p> <p>amenity/green 110:15</p> <p>amount 62:8</p> <p>analyses 110:17 116:3 119:1,4 121:4 122:6 127:14</p> <p>analysis 14:14 64:16 116:9,13,18 117:22 118:6,8,24 120:1,11, 16,19,24 121:5 128:1, 9 142:17 143:22 170:6,16,20 171:1,2,6 172:6,13,17 173:19 174:2,7,24 176:7,18 177:9,17 178:9 179:12,19 203:24 211:3 224:9</p> <p>Analytica 105:21 162:12,15</p>	<p>analyze 143:12 171:4 173:20,21 174:13</p> <p>analyzed 144:8 173:3</p> <p>analyzing 174:22</p> <p>and/or 72:14,15</p> <p>announced 30:12 32:24</p> <p>annual 101:12,13 104:14 110:12 116:10 146:8</p> <p>answering 33:23 60:4 64:21 154:17 223:14 225:16</p> <p>answers 8:22 24:11 42:17 164:4 197:12</p> <p>anticipated 33:6 41:17</p> <p>anymore 24:19</p> <p>apartments 120:17 176:9</p> <p>apparently 83:12 200:4</p> <p>appeared 36:9</p> <p>appears 40:8 47:23 53:11 69:10 71:24 83:21 136:17 142:13, 16,19 174:4 184:10 197:15 198:9 209:3</p> <p>appendix 122:12</p> <p>applicability 73:1 75:5</p> <p>applicant 23:12 28:24 197:24 198:13 199:20, 23 200:5,8,10</p> <p>applicants 18:6 20:21 21:14</p> <p>application 20:3,8 22:17 23:5 41:15,18 70:22 86:8 91:9,20,22 93:9 96:6 98:14,20,22 99:4 179:20 205:15 206:13,20 214:4,18 216:4 217:16 218:12 221:8 222:6 225:20 228:2,15,16 229:7,12, 14,23 230:12,24 231:17,21,23,24 234:3</p>
--	---	---	---

<p>applications 18:4 20:22 24:1 99:1</p> <p>applies 20:3</p> <p>apply 73:17,18</p> <p>applying 73:20 99:1</p> <p>appointed 16:9 61:20, 21</p> <p>appraisals 73:24 128:22</p> <p>apprised 193:6</p> <p>approach 138:20 164:7 246:9</p> <p>approached 40:21 41:1,7 158:1 161:13</p> <p>approaches 45:5 73:14 136:1,11 236:22</p> <p>appropriately 154:17</p> <p>approval 99:5</p> <p>approving 215:21</p> <p>approximately 26:14</p> <p>April 97:16 100:18</p> <p>architect 147:17</p> <p>architectural 45:10, 18,23 46:22 47:8</p> <p>architecture 44:12 162:22 163:1</p> <p>area 13:16 27:19 28:12 68:12 69:5 73:4 74:11,19,23 92:16 95:19 110:17 151:1 175:13,16 221:20 224:10 239:21</p> <p>areas 50:14 214:8</p> <p>argue 219:11 220:20</p> <p>argumentative 168:2 216:12 220:13 222:9 225:24</p> <p>arising 37:12</p> <p>Arrington 14:8</p> <p>arrive 174:24 176:17</p> <p>artful 235:10</p> <p>artfully 203:15</p>	<p>articles 38:12</p> <p>articulated 33:2 112:15 192:14 205:4</p> <p>articulating 216:3 217:22</p> <p>arts 15:6</p> <p>ascertain 222:4</p> <p>asks 197:24</p> <p>aspect 7:7 121:20 215:14</p> <p>aspects 112:13 155:8 175:24 213:6 214:6 215:18</p> <p>aspirations 59:22 122:24</p> <p>assess 147:8,18 178:15</p> <p>assessment 164:11</p> <p>assigning 203:15</p> <p>assist 15:22 20:8 47:19 48:1 51:1 136:23 211:19 213:2</p> <p>assistant 17:9 32:12 172:8 211:13</p> <p>assisted 27:12 34:20 246:23</p> <p>Association 15:14 58:1,4</p> <p>assume 7:11,23 22:14 26:19 111:6 126:1 184:16 244:9</p> <p>assumed 24:14 176:8</p> <p>assumes 169:6</p> <p>assumption 176:9</p> <p>assumptions 176:3, 11 177:3,11</p> <p>attached 61:3 136:2 151:8,14,15 244:22</p> <p>attaching 137:11</p> <p>attachment 53:7 162:18 163:24 201:10, 23</p> <p>attachments 135:12</p>	<p>160:13,15 163:19</p> <p>attempt 138:16</p> <p>attempted 122:3 175:13</p> <p>attempting 159:9</p> <p>attend 103:1 232:16</p> <p>attendance 103:12</p> <p>attended 28:14 103:17 194:14 233:4</p> <p>attending 62:17,18</p> <p>attends 103:3</p> <p>attention 49:8 52:8 56:8,13 82:8 135:20 151:7 153:8 181:5 191:5 196:13,23 232:24</p> <p>attorney 6:11 167:13 168:12 169:11,15 191:2</p> <p>attorney-client 242:15</p> <p>attorneys 10:16,18, 19,21 11:1,3,9 47:19 74:1 167:23</p> <p>Attract 110:14</p> <p>August 60:19 64:11 76:1 161:9 162:4 164:20</p> <p>author 172:12</p> <p>authority 17:24 99:15 220:16</p> <p>authorization 52:3</p> <p>authorized 54:4</p> <p>avoided 203:15</p> <p>aware 11:5 22:24 27:16 28:12 33:5 88:7 113:11,13 116:8 121:15 125:15 126:15, 17,20 152:24 169:17 179:10,15,17,23 194:15 197:24 198:13 207:10 210:6 211:7 238:22 241:15 243:10, 13 245:21 248:18 254:5</p>	<p>B</p> <p>B-I-T-A-R 31:10</p> <p>bachelor's 15:6</p> <p>back 21:2 38:6 42:5,7 67:19 73:12 88:4 92:13 105:18 121:8 125:6 128:13 129:2 132:4 140:2 150:17 151:10 156:6 157:10 173:5 192:4 204:14 214:10 229:10 230:16 232:1,11,22 245:2</p> <p>background 40:19 58:9 141:10 146:14</p> <p>balance 34:1 45:5 64:5 115:8 117:3 119:16 135:23 214:12 215:5 217:16 218:13 221:2,4</p> <p>balanced 34:4 64:6, 23 68:1 114:19</p> <p>balances 67:18</p> <p>ballot 77:23 78:1</p> <p>base 33:15</p> <p>based 41:19 43:9 66:4 78:8 96:10,15 108:19 113:17 118:23 119:24 120:2,5,13 128:18 135:6 144:7 152:19 161:15 171:13 174:2 177:2 185:2 197:16 198:8 221:23 227:1</p> <p>basically 90:7 95:16 129:14</p> <p>basis 220:4 222:4</p> <p>Bates 31:8 39:24 48:14 51:21 55:1 56:5 68:14 100:18 134:22 136:22 142:2 146:2 170:10 201:6 209:14</p> <p>bathroom 87:21</p> <p>Beach 13:16 27:19</p> <p>bear 134:15 175:2 199:6 217:20 222:10 225:1</p>
--	---	--	--

<p>Beautiful 77:13,16,18 78:10 85:11</p> <p>begin 7:19</p> <p>beginning 10:5 51:5 78:21 151:11 189:12 229:1</p> <p>behalf 14:16</p> <p>behaviors 123:4</p> <p>beliefs 86:3 147:14 149:10</p> <p>believed 50:11 68:1 85:4</p> <p>beneath 77:12</p> <p>beneficial 143:19</p> <p>benefit 33:16,20 42:6 65:24 74:14 104:11 135:19 147:21</p> <p>Bickford 27:12</p> <p>big 49:15 210:21</p> <p>bigger 25:20</p> <p>bike 22:8</p> <p>bike/ped 22:8 29:19 47:4</p> <p>binder 65:19</p> <p>bio 181:16</p> <p>bit 22:13 33:18 57:1 114:17 197:20</p> <p>Bitar 31:10 32:3,4 33:11 38:22 39:18 47:23 69:20</p> <p>blank 201:7</p> <p>blanks 40:7</p> <p>Bo 126:21 158:2 159:21</p> <p>board 14:15 157:23</p> <p>Bob 61:22</p> <p>body 8:2 85:20 228:19</p> <p>bones 205:22</p> <p>Bonnie 76:18 183:7</p> <p>book 65:18</p> <p>bottom 63:7 108:21</p>	<p>133:5 218:24</p> <p>box 49:15</p> <p>brand-new 236:18</p> <p>breadth 19:24</p> <p>break 8:11,13,17,20 52:20,22 53:3 88:1,5 124:1,12,16,18 180:3, 7</p> <p>breaks 181:16</p> <p>Bridge 50:17</p> <p>briefly 122:11 229:2</p> <p>bring 196:12,23 232:1</p> <p>bringing 172:5</p> <p>broad 106:19 215:15</p> <p>broadbrush 215:12, 22</p> <p>brought 145:9 155:17</p> <p>Brown 17:11,17 18:24 19:17 20:12,19 22:16 32:14 55:6 56:4 58:10 69:18 71:11 89:4,14, 21 90:10 92:6,12 99:8 152:12 190:23 191:1,7 192:20 193:1,8,21 209:14 210:11 211:7, 11,19 212:3,15,22 214:7 215:13 220:18 224:7 229:19 232:4 233:10,16,17,22 234:4,8,24 238:20 246:19</p> <p>Brown's 22:15 194:13 196:8 210:8 216:2,10, 19,23 217:21 218:24 219:19 223:2 226:21 227:2,13 229:14</p> <p>Brownlee 126:21 127:2 158:2 159:2,13, 21 160:8,15 228:24 229:18 253:22 254:11</p> <p>Bucher 132:18 205:3 206:22</p> <p>budget 14:14 16:2,18, 20,22 25:21 29:12,19 34:6 44:7,8,9 119:12</p> <p>buffer 110:16</p>	<p>build 102:4 231:8</p> <p>building 19:22,23 32:6 68:13 69:6 92:17 93:3 212:10</p> <p>buildings 30:8</p> <p>built-out 35:23</p> <p>bullet 114:9 116:7</p> <p>bullets 109:8,10,16</p> <p>bunch 79:19 114:16</p> <p>Bureau 57:20</p> <p>Burpee 61:22</p> <p>business 37:21,24 58:1,3 102:9</p> <p>Busy 233:9</p> <p>buy 64:20 165:17 227:4</p> <p>by-product 147:24</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>call 23:13 36:1 64:15 71:13 77:20 78:11 111:15 116:16 128:13 176:19 236:21</p> <p>called 27:11 50:20 105:20 123:19 165:7</p> <p>calls 20:5 24:23 37:11 221:15</p> <p>campaign 77:19 78:10</p> <p>campus 37:9</p> <p>capable 55:12</p> <p>capacity 9:12 138:8</p> <p>capital 67:23</p> <p>caps 56:15</p> <p>captured 111:14,19</p> <p>captures 112:21</p> <p>capturing 111:9,11</p> <p>carbon 180:24</p> <p>care 49:10 86:1 92:18</p> <p>cared 86:1</p>	<p>career 25:13</p> <p>careful 158:13 173:18</p> <p>carry 145:11,16</p> <p>cart 145:10</p> <p>case 6:11 12:4,17 18:10 19:17 20:12 21:3 32:9 142:13,20 157:22 158:23 164:19 226:11 239:8</p> <p>cases 16:3 21:18 178:3</p> <p>catch 12:24 72:11</p> <p>categories 106:19</p> <p>category 85:3</p> <p>caused 94:6 168:16</p> <p>caveated 141:14</p> <p>caveating 177:5</p> <p>CC'D 142:15 186:19</p> <p>CC'ING 76:18 182:1 186:21</p> <p>CCS 152:15</p> <p>cease 32:24 37:2</p> <p>ceased 30:6,14,19 32:23 33:3 35:14</p> <p>ceasing 33:5</p> <p>cement 112:24</p> <p>center 26:14 46:12 85:23 108:11,12,14</p> <p>centers 150:12</p> <p>central 86:2 149:24</p> <p>centrally 150:8</p> <p>certifications 15:12, 15</p> <p>certified 6:3</p> <p>chain 71:12 76:2,14 91:4 142:10 180:22 186:14</p> <p>challenges 25:19,21 26:3 37:4</p> <p>challenging 147:3,8 203:3,4</p>
--	---	--	---

<p>chance 31:18 48:22 76:9 89:6 108:24 243:17</p> <p>change 51:3</p> <p>changed 32:5 35:16 71:20 205:23</p> <p>changing 129:19</p> <p>character 46:5,8 150:19</p> <p>characteristics 44:13</p> <p>characterization 58:17,23 208:7</p> <p>characterize 83:23 85:10 95:15 132:23 153:4 158:19 202:14 203:6 208:12,22</p> <p>characterized 154:15 159:16 184:22</p> <p>characterizing 203:16</p> <p>charter 16:7,17 17:22, 23 18:21 22:2 77:22 123:16 155:5 222:23 223:8</p> <p>checklist 68:12 69:7 70:6,20 71:1</p> <p>checklists 69:21 70:3</p> <p>children 37:24 49:10</p> <p>children's 36:23 99:23 110:9 112:14</p> <p>choose 223:5</p> <p>chose 148:10</p> <p>Chris 6:10 75:18 126:1 178:18 225:14 253:6</p> <p>chronologically 94:8,17 97:23</p> <p>CIC 39:3 57:13,15,17</p> <p>CIC's 39:5</p> <p>circular 188:2</p> <p>circulate 206:23</p> <p>circumstance 89:24 142:21 168:14</p>	<p>circumstances 47:12 96:5 168:10</p> <p>cite 30:3 221:13</p> <p>cited 226:15</p> <p>cities 14:11 80:5,18 138:20 147:2</p> <p>citizen 79:2 243:2</p> <p>citizen's 23:13</p> <p>citizens 56:16 64:19 78:24</p> <p>citizens' 86:20</p> <p>city 10:2,3,5,7,9,11,17 12:1,2,13 13:2 14:16, 17 15:13,18,19,21,23, 24 16:7,8,9,15,17,18, 24 17:1,3,5,9,17 18:10,16 19:3 20:9 21:13 22:10,16 25:3,6, 8,9,10,16,18,20,22 27:8 28:5 29:2,3,7,16 30:20 32:7,8,12 34:18 38:7,8,13 39:4,11 40:2,8 41:20 43:15 46:4 49:13,18 52:6,13 54:6,12,24 55:5 56:22, 23 57:4 58:16 59:11 61:5,11,12,21 62:2,6 63:2,11 65:24 66:5,7,8 67:13,14 69:5,23 70:5, 23,24 76:5 77:9 78:4 79:4 84:22 86:3,17 88:7,10,18 91:6 92:10 96:22 97:5 99:20 101:11,16,21,24 102:16,18 103:3,16 104:5,9,13 106:5 107:11 108:8 110:21, 22 111:19,20 112:7,8 113:1 114:4 115:18 116:22 117:1,2,11,18 118:7 120:1,16,20 121:7 123:13 125:9,16 128:6 130:9 131:3,4 133:12,14 138:7 141:12,17 145:13 148:4 149:2,7,22 150:9,14,18 152:8,10 156:2,19 161:20 162:2,23 165:17 167:14 169:13,15 170:4 171:15 172:9 177:14,17 178:1</p>	<p>179:21 181:1,17,20 182:5,16 184:2 186:20,21 188:20 190:18 191:8,22 194:16,24 195:6,23 198:11 202:17 203:7, 8,9 210:5,20 211:8,13 212:7 220:14 222:22 223:1,7 227:23 235:19 236:3,16 238:16 241:15 243:2 244:1,5 245:21 246:12,22,23 247:10 248:20 249:3, 16,18,20 251:19,20,21 252:2,11,19 254:13</p> <p>city's 11:1,3,9 14:20 26:24 34:6,24 44:7 60:23 61:1 86:18 103:20 119:12 191:1 216:18 242:15 247:1</p> <p>city-adopted 129:21</p> <p>clarification 233:3</p> <p>clarifies 246:20</p> <p>clarify 58:12 99:9 118:12 121:1 212:19 245:5</p> <p>clarifying 206:17</p> <p>clarity 128:11 129:6 155:2,20 156:10 172:21</p> <p>Clean 72:3</p> <p>cleaned 214:7</p> <p>clear 20:16 21:9 42:20 59:3 81:17 83:10 86:6 178:16 211:22 214:5 216:5 228:18 229:22 239:16 241:2,5</p> <p>clerk 189:2</p> <p>client 6:14</p> <p>client's 226:8</p> <p>climate 86:22</p> <p>close 236:12,13,14</p> <p>co-counsel 97:12</p> <p>co-created 164:8</p> <p>coached 188:1</p> <p>code 18:7 19:23 20:4, 5,6 24:5 50:23 51:2,3, 4</p>	<p>codified 22:1,3,6 47:6 90:12 123:16</p> <p>coffee 52:24 87:22</p> <p>coherent 211:21</p> <p>coherently 152:18</p> <p>cold 28:1</p> <p>collected 77:24 176:16</p> <p>college 14:6 15:4</p> <p>Columbus 37:22</p> <p>combination 34:5 112:9</p> <p>comfortable 132:19 202:14</p> <p>comment 52:17 53:22 216:19 226:16 246:18 247:3</p> <p>commented 226:22 228:22</p> <p>commenting 227:2</p> <p>comments 75:15 172:21 214:10 215:1 221:18</p> <p>commercial 95:18 117:17 119:11</p> <p>commercial/mixed-use 110:14</p> <p>commission 17:24 18:12,20 19:15 20:7,9, 24 23:9 39:4 61:6,10, 11,16,24 62:5,6 63:3 67:4,8 121:11 178:4 210:24 212:8,12,21,23 222:23 229:21 230:14 231:5,10,16,19 232:2, 3,8,17</p> <p>commission's 17:22 18:9,19 19:3 39:15 62:20 67:12 212:13 223:8</p> <p>commissioners 61:19</p> <p>commissions 14:18</p>
---	--	--	--

<p>66:19</p> <p>committed 37:9 232:6</p> <p>committee 57:2,5</p> <p>communicate 90:10 227:23 229:3 237:2</p> <p>communicated 231:3 232:5</p> <p>communicating 86:11 233:11</p> <p>communities 6:12 119:2,6 120:8</p> <p>community 25:14 26:7 27:4,15 29:1 33:13,17,20 35:11,23, 24 36:4,9 37:1,7,13 38:16,23 39:2 44:1,5, 17,19 50:9 55:20 58:12,20 59:4,11,12, 22 62:9 63:6 73:5,16 77:5 85:6,21 86:13 87:1,16 91:17 96:1 108:10 115:1,10,13 118:4 119:16 120:23 121:16,20,22 122:6 123:7 131:19 138:3,4, 14 139:16,18 140:12, 20 143:20 147:4,13,14 148:11,14,23 149:13, 15,18,19,21,24 154:15 155:4,10,14 161:2 164:7 165:7,11,21 166:1,7 172:1 204:18 214:21 215:1 218:7 219:8 224:9,17,19,21 227:21 231:8 243:4</p> <p>community's 37:8</p> <p>Community-wide 162:23</p> <p>comp 22:6 39:14 45:17 189:22 201:3 202:8 203:9 205:18,21 207:11,18 208:4,22</p> <p>companies 119:3</p> <p>company 105:20</p> <p>comparable 120:21</p> <p>compare 226:7</p> <p>comparing 218:15</p>	<p>compatible 45:20</p> <p>compensation 52:9</p> <p>compile 79:20</p> <p>compiling 79:23</p> <p>complaint 11:17 12:16</p> <p>complements 224:16 225:6</p> <p>complete 8:22 9:5 178:10 237:16</p> <p>completed 32:1 42:23 90:17 137:17 144:20 174:20 210:12 236:12</p> <p>completely 124:3</p> <p>complex 70:15</p> <p>component 64:6,23</p> <p>comport 226:5</p> <p>compound 41:24 42:13,18 111:5 133:16</p> <p>comprehensive 14:20 28:10,21,23 29:9,18 35:1,13 41:5 43:12 44:3 45:1 46:21 47:7 48:2 51:10 52:14 55:15 58:11 59:6,10 65:24 66:10,14 85:5, 20 88:14 115:4 131:16 151:19 152:22 153:2 155:9 182:18 183:10, 12 185:10 186:5 187:5,13 198:11 202:15 203:13,17 204:1 205:8 206:23,24 214:12 215:15,18 218:20 224:11 228:18 229:22 230:1 244:22 245:1,11 246:3,8 247:2,17,24 248:21 252:1</p> <p>concept 41:21 120:22 158:6 214:19 218:15</p> <p>concepts 232:3</p> <p>conceptual 41:16 80:4 87:2</p> <p>concern 36:5 38:16 56:20 96:22 114:15 193:18 223:17 227:23</p>	<p>concerned 21:15 67:21 115:2</p> <p>concerns 109:1 135:7 215:4,14 230:9,11</p> <p>conclude 47:18</p> <p>concluded 99:18 143:18 236:11 242:19 254:23</p> <p>conclusions 161:5, 21 210:13,17 216:22 219:19</p> <p>conditions 53:9</p> <p>conduct 101:17 121:12</p> <p>conducted 120:20 121:16 179:20,22</p> <p>conducts 106:10</p> <p>Conference 92:19 95:2 98:6 99:14,22 100:6 215:9</p> <p>Conference's 94:23</p> <p>confirmed 181:17</p> <p>conflict 35:22</p> <p>confused 7:7 240:20</p> <p>confusion 241:2</p> <p>connection 12:10 49:19 52:14 57:11 66:14 74:5,6 101:21 139:22 140:20 173:14 176:3 178:13 218:10 221:22 251:4</p> <p>consensus 85:6 112:3 126:11 129:21, 24 155:2 203:5 204:10 206:5</p> <p>conservation 72:3 74:14</p> <p>consideration 78:1 111:16</p> <p>considerations 138:22</p> <p>considered 12:5 66:9,11,13 102:19 148:7 200:8 215:6 251:21 252:2,19</p>	<p>consistent 95:17</p> <p>constantly 161:17</p> <p>constituents 84:12, 13,14</p> <p>constraints 67:21</p> <p>construct 41:8</p> <p>constructed 232:1</p> <p>consult 138:24 139:5, 24 141:16 157:4 173:13 177:24 247:10</p> <p>consultant 15:1 34:13,14,20 104:3 146:24 148:24</p> <p>consultants 246:23</p> <p>consulted 139:7 140:23 157:19</p> <p>consulting 14:5,10, 12,22 15:2 105:20 141:2</p> <p>contact 49:14 113:7 178:12 239:14</p> <p>contained 248:8</p> <p>contemplated 35:19 45:9 116:18 165:3 214:13</p> <p>contemplating 39:8 164:22</p> <p>contemplative 201:20</p> <p>content 82:6 92:1 101:3 114:22 164:7 211:2 236:12</p> <p>contents 249:2,10,15</p> <p>context 35:10 45:24 46:13 50:6 70:10 85:24 147:12 150:13 194:13 198:8</p> <p>Continental 40:21 41:8,21 43:6</p> <p>continue 34:7 42:20 66:22 100:7 124:11 225:14</p> <p>continuing 37:22</p> <p>contract 175:19</p>
--	---	---	---

<p>contracting 34:12</p> <p>contractual 95:3</p> <p>contribute 45:11</p> <p>contributed 41:3 69:20</p> <p>contributing 37:19</p> <p>control 18:20 86:9</p> <p>controversial 35:21 36:16</p> <p>controversy 85:24 147:4 206:3</p> <p>Convention 57:20</p> <p>conversation 64:15 73:20 96:13 102:14 110:5,7,12 113:22 118:4 125:13 126:24 132:4 135:7 138:9 143:3 145:2,4 156:22 159:21 160:7 173:11 186:15 187:17,21 198:1,14 210:15 217:24 228:17 254:2</p> <p>conversations 63:20 64:3 78:19,22 91:18 99:21 127:4 132:21 154:20 156:7 159:1,4, 12 197:11 213:10,15 231:13 233:21 234:8 248:15,19</p> <p>convey 200:17 230:10</p> <p>conveying 62:4</p> <p>coordinating 18:4</p> <p>coordination 13:12</p> <p>coordinator 32:5 172:13</p> <p>copy 69:7 167:4 168:19,21 190:14 202:4</p> <p>copying 180:24</p> <p>core 225:2 227:17</p> <p>corner 53:16 92:21 93:4,9,18,19,21 94:24 95:19 151:10</p> <p>corporation 14:14 38:23 39:3</p>	<p>correct 10:4 19:20 24:8 35:7 40:4 41:11 43:16 60:24 74:8 76:6 78:4 80:10 89:14,17 93:13 95:9 98:21,23 104:3 111:10 125:21 142:12 149:2 164:9 165:22 170:20 173:4 174:3 181:21 182:6,19 183:12,22 184:8 191:23 196:9 199:20 204:2,5 205:13 207:2 213:4 220:7 228:24 229:4 236:17,20 251:10 254:5</p> <p>corrected 198:5</p> <p>correctly 81:21 82:7 112:15 154:3,5 204:11</p> <p>corridor 50:17</p> <p>corridors 72:15 74:8, 17</p> <p>cost 67:23 115:11,17 116:22 117:6,15 118:19 143:1,8,14 144:20 171:20 175:14, 18 177:14,17</p> <p>cost-to-serve 116:13, 17 117:22 118:8 120:10,19,24 121:5 128:1 143:22 170:6,16</p> <p>costs 116:20 144:9 172:12 175:17,23 177:19 178:1,15</p> <p>council 12:1,2,13 15:23 18:10,16 20:10 25:6,7 39:4 40:3,8 51:1 61:5,12,21 62:6 63:2 64:24 66:5,8 67:13 73:20 76:5 77:10 78:4 91:6,14 97:5,15 101:12,17,24 102:9,14,15,18 103:1, 9 104:13 105:17 106:24 107:4 112:1,17 121:13 122:12,16,17, 19 123:13,17 126:12 129:7,17 130:10,11, 16,22 131:4 132:7,17 133:14 138:3,5 139:10 142:16 143:16,17,21 144:15,17 146:8,9 152:8,10 153:1,11,22</p>	<p>154:10 155:7,8 156:13 157:17 163:15 170:4 171:5,11,15 172:2 176:20 181:1,17,20 182:5,12,15,16,22 183:14,21 184:2 185:1 186:1,4,12,20 188:20 189:13 190:18 191:9, 22 192:14 193:5,12 194:16 195:23 196:14, 16,24 198:12 199:8,13 202:17 203:8,10,19 206:16 207:24 208:5 212:7,17 220:15 223:2 235:12,13,16 236:16 237:8,13,24 238:5 243:2,9 244:1 245:21 246:16,17 247:23 249:1,7,10</p> <p>council's 16:19 19:3 20:24 23:9 29:21 65:24 101:21 104:11 106:5 110:21 112:7 153:7 182:17 223:7 235:19 236:3 244:5</p> <p>council/staff 107:16</p> <p>Councilman 80:22 84:5 132:11,12 165:20 168:11 171:16 181:18 187:1,11 188:13 189:17 206:8,21,22</p> <p>councilmember 132:18 142:11 151:18 152:20 154:21,23 156:7 182:7 195:22 196:3,21 197:3,8,23 201:1 203:11 206:21 236:15</p> <p>councilmembers 66:24 111:20 131:23 132:13 142:1 156:4 158:6 184:12 188:2,9 203:19 204:22 205:6, 20 237:5,9 249:11</p> <p>councilmembers' 110:23</p> <p>Councilmen 198:12 201:11 202:6,21 204:9 207:15</p> <p>Councilmen's 199:2</p> <p>Councilperson</p>	<p>134:20 135:2 136:7 182:1</p> <p>councils 14:17</p> <p>counsel 42:9 48:13 49:19 50:4 65:15 81:16 82:23 109:21 124:7 151:3 178:19 216:17,18</p> <p>counties 14:11 147:3</p> <p>county 13:4,6,9,13, 15,17,18,21,22 14:3, 17,18 15:13 37:17 72:4</p> <p>county's 13:11</p> <p>couple 49:7 194:23 219:10</p> <p>court 7:15 8:2 9:21 145:15</p> <p>Court's 12:20</p> <p>cover 244:15</p> <p>covered 52:10</p> <p>COVID 194:22 195:2</p> <p>create 69:21 70:23,24 86:21 188:3 247:1 250:13</p> <p>created 45:7 137:11 167:13</p> <p>creating 7:16 14:19 117:18 138:24 173:8, 15</p> <p>creation 51:8 150:17</p> <p>credential 15:14</p> <p>Creek 73:4 74:19,23 110:16</p> <p>crimes 37:10</p> <p>critical 18:20 33:15,19 44:13 114:21 118:4 147:12</p> <p>critically 44:11 117:4 148:7</p> <p>cross-collaborating 79:3</p> <p>CROSS- EXAMINATION 6:4</p>
--	--	--	--

<p>crossed 53:13</p> <p>Cunningham 51:1</p> <p>Cunningham's 51:9</p> <p>curiosity 128:15</p> <p>current 34:10 44:8 77:9 200:14 224:13,16 225:6</p> <p>custom 193:3</p> <p>customarily 177:24 178:7</p> <p>customary 193:7,23</p> <p>CVB 57:19</p> <p>cycles 131:22</p>	<p>219:11 226:11</p> <p>decades 26:5</p> <p>December 10:6,8 12:6 27:24 28:5,13 182:1,10,13 252:9,23</p> <p>decide 29:8 112:24</p> <p>decided 99:14</p> <p>deciding 20:17</p> <p>decipher 93:23</p> <p>decision 12:20 18:18 20:15 37:2,20 38:10 95:11 223:1,7 237:7</p> <p>decision-making 23:9 29:22 44:18 86:22 161:6 220:15</p> <p>decisions 96:4 102:9 130:16</p> <p>declined 182:23</p> <p>deficiencies 50:22 215:20 217:11 221:16</p> <p>deficient 214:9 226:8</p> <p>define 30:9 78:13 81:2 84:6</p> <p>Defining 44:13</p> <p>degree 54:15,16 149:14 197:13 198:21 229:20</p> <p>degrees 15:5,9</p> <p>Deland 27:21</p> <p>deliver 116:22</p> <p>demand 117:8,15</p> <p>demande 45:6 119:17,18</p> <p>demands 117:10</p> <p>demolished 30:7</p> <p>demolition 30:10</p> <p>denial 12:12</p> <p>dense 215:7</p> <p>densely 151:4</p> <p>density 110:17 116:3, 9 120:17,21 214:16 218:1,5,10 219:4,7</p>	<p>221:3,22 222:6 223:11,18</p> <p>department 13:8,13 17:6,12 18:3 19:1,24 20:20 22:15,19 32:6 61:13 63:12 103:7 175:13 177:1</p> <p>department's 212:10, 11</p> <p>departments 175:22 211:15</p> <p>dependent 119:8</p> <p>depending 92:13</p> <p>depends 21:8 30:4 103:11</p> <p>depicted 90:15</p> <p>deposed 6:22 11:6</p> <p>deposes 6:3</p> <p>deposition 6:13 7:1, 4,16 9:19 10:23 11:8 24:15 30:23 39:20 48:8 51:15 54:19 55:23 60:9 68:7 71:6 75:20 88:23 90:23 96:24 100:12 134:9 141:20 145:7,12 166:11 169:20 180:11 185:18 190:6 195:14 200:20 209:6 220:22 226:11 231:14 240:9 254:18</p> <p>deputy 13:21</p> <p>derived 44:9 119:10 178:16</p> <p>describe 18:2 19:12 202:8 245:8</p> <p>description 65:4</p> <p>design 45:15 161:15</p> <p>designated 62:8</p> <p>designed 46:6 241:1</p> <p>desire 33:2 67:8 73:6 208:24</p> <p>desired 109:12,14 110:13,21,23 118:2 178:13 214:5 248:4</p>	<p>desires 216:17</p> <p>desiring 171:23 225:9</p> <p>desirous 85:3</p> <p>desk 168:22</p> <p>detail 70:2 148:19 165:1 220:19 227:12, 13</p> <p>detailed 109:8 116:13,17 119:4 192:2</p> <p>details 36:20 48:4 70:12 126:16,22 127:8 173:6 174:19 192:6,10 199:15 213:7 251:12, 15</p> <p>determine 175:14</p> <p>determining 139:23 140:4 175:16</p> <p>develop 27:14 49:15 56:21 58:14 67:24 102:5 105:17 110:15 159:10 178:14</p> <p>developable 149:9 250:11 251:9</p> <p>developed 33:13 59:13 99:19 151:5 165:18 173:3 177:1 212:22</p> <p>developer 49:14 73:10,12,13 141:16 178:1</p> <p>developers 178:4</p> <p>developing 92:16</p> <p>development 14:21 15:24 16:12,23 24:1,2, 6 25:23 27:1,6,11 28:7,18 32:5 33:10 34:6 39:6 44:19,21 45:13 50:13 56:18 64:6,24 68:2,4 73:8 80:19 86:7 90:2 92:12 95:18 116:14,19 117:6,7 120:14 121:24 143:9,12 144:9 148:2 149:22 159:14 163:1 166:16,22 171:21 175:20 177:20,21 178:2 179:21 194:4,9 205:15 206:14,15,20</p>
<p style="text-align: center;">D</p>			
<p>dark 160:4 194:2 232:10</p> <p>Darren 60:18,22</p> <p>data 174:23 176:15</p> <p>date 12:8 27:5 28:9 30:11 68:19 78:6 87:7 92:1 154:23 156:8 190:23 196:7 211:1 235:16,22</p> <p>dated 31:10 40:3 51:21 56:4 60:19 61:4 71:11 76:1 89:4 91:6 97:16 100:18 134:21 142:1,15 146:2 151:15 161:8 162:4,12 164:24 170:4 181:1 186:1,21 190:19 195:23 201:1 209:14</p> <p>David 76:17 77:8 180:23 184:23 186:20</p> <p>day 23:20 124:7 138:15 177:24 188:18 246:15 247:4</p> <p>day-to-day 15:20</p> <p>days 191:19 206:9</p> <p>Daytona 13:16 27:19</p> <p>dealing 80:6</p> <p>debate 164:23 172:4 183:5 188:7 218:19</p>			

<p>211:17 212:9 214:6 242:24 251:22 252:19</p> <p>developments 24:3,7 51:4 115:12 193:14</p> <p>dialogue 22:5 35:12 64:16 73:4 86:16 111:11 117:23 126:9 128:3 138:4,15 139:10,20 140:21 143:6,20 153:7 155:13 215:1 238:21 242:8 253:21</p> <p>differences 163:16</p> <p>differentiate 163:8</p> <p>differently 85:21</p> <p>difficult 9:1 123:5 125:23 154:22 155:10 160:6 206:4</p> <p>digs 165:1</p> <p>diligence 127:15 128:2</p> <p>diligent 128:17 188:5</p> <p>diligently 93:6</p> <p>diplomat 203:22</p> <p>direct 56:8,13 96:11 100:3 117:24 127:3 135:20 151:7 153:8 181:4 191:5 193:8 241:23</p> <p>directed 73:18 121:13 130:22 152:7 193:1 218:14 248:24 249:19, 23</p> <p>directing 52:8 82:8 153:21</p> <p>direction 66:21 85:8 102:11 128:18 130:9 131:14,17 132:6 147:10 149:11,19 155:3,20 185:12,13 203:12 205:7 246:10</p> <p>directionally 203:14 205:13</p> <p>directions 86:4 155:9</p> <p>directly 13:7 96:13 100:5 199:8 202:21 224:2</p>	<p>director 10:12,13 17:11 28:19 54:1 60:18,24 61:2,15 103:6 152:3,9 168:24 191:2 234:23 244:10</p> <p>director's 37:6 152:17</p> <p>directors 37:6 103:7, 8,10 112:18 210:20</p> <p>disagree 213:20</p> <p>disagreed 53:22 54:8 85:18 204:9</p> <p>discern 164:18</p> <p>discerning 84:11 160:6</p> <p>discord 147:4</p> <p>discouraged 153:12, 23 154:10 156:5,8,11</p> <p>discourse 154:16</p> <p>discuss 41:20 72:5 157:14 208:3 210:10</p> <p>discussed 78:17 96:2 102:7,21 103:18 106:5,6 107:12 108:20 113:20,23 143:24 171:15 173:12 184:14 185:11 186:12 191:8 194:15 198:11 199:8 202:1 210:13,17 242:1 243:1 254:5</p> <p>discussing 73:1 103:11 121:5</p> <p>discussion 22:7 26:9 27:9,16 35:17 62:21 68:21 109:7 110:20 111:12,13,18 112:2,11 113:6 114:11 136:6 138:16 141:6 174:11 184:18 190:20,24 192:15,24 193:2 196:4,13,24 225:4 230:22 239:21 240:10 242:2,4,10 254:4</p> <p>discussions 27:2,7 43:17 63:17 125:16 129:7 159:15 193:9,20 197:8 252:20 253:8</p> <p>dispute 26:15 147:1</p>	<p>159:10</p> <p>distinctive 44:16 45:20</p> <p>distinctively 45:19</p> <p>distinctly 45:12,16</p> <p>distinguish 163:16</p> <p>distracting 201:15</p> <p>distributed 172:20</p> <p>distributes 189:5</p> <p>district 45:23</p> <p>divide 149:18</p> <p>divided 161:2</p> <p>division 203:18</p> <p>Dockery 105:14</p> <p>document 22:21 29:12,15 48:17 50:15 56:10 65:4 68:23 79:13 82:9,13,15,17, 20,24 100:22 101:1 105:17 109:19 110:4, 13 113:10,14 114:1 118:16 121:22 123:21 128:4 133:7 136:3,10, 12,13,20,24 137:10,14 138:4 139:8 144:5 157:15 162:17 164:14 177:4 183:1 201:15 202:5,16 203:5 204:5 209:10 211:19</p> <p>documentation 234:3</p> <p>documents 6:15 10:24 11:10,12,20 12:17 22:4,10,22 45:14 46:20 47:2,5 67:20 81:20 112:22 135:12 164:5 171:13 182:20 183:6 184:5 203:8 254:15</p> <p>dollars 117:18</p> <p>door 210:2 211:5 236:10</p> <p>draft 40:5,9,10,19 43:5 136:2,10 137:13 146:21 151:22 159:7 161:9,12,19 163:13,14 164:5,8 165:4 247:4</p>	<p>drafted 136:19 151:15 170:20 223:19 244:8, 11,16 245:18</p> <p>drafting 136:24 141:3 234:20 244:18 245:1, 7,13</p> <p>drafts 113:14,16,24 146:21 158:4 159:7 161:16 163:10 207:7</p> <p>drank 52:23</p> <p>drawing 49:8</p> <p>drawn 69:10</p> <p>drew 176:16</p> <p>drink 88:6</p> <p>drive 118:1 138:18</p> <p>driving 251:14</p> <p>drugs 8:24</p> <p>due 127:15 128:1</p> <p>duly 6:2</p> <p>duties 16:19 18:21</p> <p>duty 222:24</p>
<hr/> <p style="text-align: center;">E</p> <hr/>			
<p>Eagle 41:9 49:16</p> <p>earlier 9:18 31:13 50:19 56:12 95:12 98:7 99:4 125:8 137:24 138:14 143:1, 6,24 146:6 154:15 155:14 165:3,6 171:13 177:23 184:6 191:11 192:9 201:13 202:1 204:8,24 214:11 226:14 246:16,20 253:20</p> <p>early 51:6 126:14 146:20 171:16 235:16 246:7,15 252:9 253:23</p> <p>economic 15:23 16:11,23,24 25:23 26:2 34:2 58:6 115:21</p> <p>economic- generating 214:14 230:5</p>			

<p>economically 114:24 115:9 215:7</p> <p>edits 172:22</p> <p>educate 138:19</p> <p>educational 108:11</p> <p>effect 41:15</p> <p>effort 35:5 63:23 64:14 122:22 128:17 129:3 131:1 159:6 160:24 189:19 215:10</p> <p>efforts 125:9,16</p> <p>elaborate 36:17</p> <p>elect 182:7</p> <p>elected 78:6 142:11 181:18</p> <p>election 131:22</p> <p>elections 155:7</p> <p>elements 45:11 161:18</p> <p>email 71:10,12,17,19, 22 72:1,4,8,12 75:24 76:2,14,17 77:13 79:5 80:23 83:17,20,24 89:3,12,16,20 90:4 91:4,5,11,13 97:4,15 134:19 135:1,3,5,6,13, 21 137:12 141:24 142:6,10,14,22 145:23 146:13 148:10,13 160:14 162:19 163:20, 23 164:4,10 168:20 180:22,23 182:5 183:17 185:3,24 186:4,14,19 187:14,23 188:6,8 189:18 190:17,22 191:20 192:14 195:21 196:2, 6,11 197:5,12,21 198:19 199:7 200:3,6, 24 201:2,11,23 202:23 206:7,9 208:10</p> <p>emailed 182:11</p> <p>emailing 181:24 182:10 196:7</p> <p>emails 114:4 144:2 171:17 172:3 184:10 188:3 198:9 207:14, 16,18 208:23 233:20</p>	<p>embedded 46:1,2</p> <p>emerge 106:9</p> <p>EMH&T 160:2</p> <p>Emily 75:9</p> <p>emotional 133:3</p> <p>emphasize 225:8</p> <p>employ 147:7</p> <p>employee 22:14</p> <p>employees 156:19</p> <p>encourage 133:10 134:6</p> <p>encouraging 231:4</p> <p>end 23:20 33:11 182:12 184:24 188:6, 10 189:12 196:24 213:4 250:22</p> <p>ending 30:12</p> <p>engage 126:8 141:11</p> <p>engaged 39:9 169:15</p> <p>engagement 44:20 48:13 52:5,9 53:4,8,21 54:9,12 96:2 133:4 158:8 160:23 253:20</p> <p>engaging 158:15 160:5</p> <p>engrained 110:6</p> <p>enjoying 25:22</p> <p>ensuing 215:2</p> <p>ensuring 135:24</p> <p>entailed 78:14</p> <p>entire 10:9 103:7 177:17</p> <p>entirety 181:12</p> <p>entitled 68:12</p> <p>entity 37:22</p> <p>entry-level 13:20</p> <p>environment 123:5 147:9</p> <p>episodically 38:14</p> <p>ER/URGENT 92:18</p>	<p>era 119:9</p> <p>essentially 58:5 148:21 165:16 194:2 218:5</p> <p>established 50:10</p> <p>estate 128:23</p> <p>estimates 177:1</p> <p>evaluate 34:10</p> <p>evaluated 121:23</p> <p>evaluating 128:3 171:9</p> <p>evaluation 69:12 70:13 121:12</p> <p>evening 237:21</p> <p>event 28:14,20 168:16</p> <p>events 63:6 240:12,21 254:10</p> <p>eventual 79:7,14</p> <p>evidence 169:6</p> <p>evolve 161:16,17</p> <p>evolved 133:1</p> <p>exact 11:13 28:9 78:6</p> <p>examples 128:20</p> <p>exceeded 219:8</p> <p>excellent 8:9 211:22</p> <p>exceptionally 172:19</p> <p>exchange 183:18 188:3</p> <p>Excuse 81:11 94:11 97:10 127:17</p> <p>executive 129:17</p> <p>exercise 99:14 128:7</p> <p>exercised 95:2</p> <p>exhausted 254:14</p> <p>exhibit 30:23 31:5,7,9 38:22 39:20,24 40:1, 17 48:8,12,13 51:15, 19,20 53:4 54:19,23 55:23 56:3 60:9,17,22 65:9,11,16 66:6 68:7, 11 71:6,10 75:20,24 76:16 79:6 83:17</p>	<p>86:23 88:23 89:3,11, 12,19 90:8,15,23 91:4 96:24 97:4,14 98:4,5, 11,16 99:12 100:12,16 101:8,19 103:20 105:5,18 108:19,23 110:10 122:12 134:9, 13,14,19 135:6,21 136:23 141:20,24 142:6 145:7,21 151:9 160:14 162:11,14 166:11,15 167:4 169:20 170:3,9,14 172:7 175:10 177:9 179:13 180:11,22 181:4,12,24 183:13 184:7,10,20 185:9,18, 22,24 186:17 187:1 190:6,17 191:6 195:14,18,21 196:9,21 197:13,16,22 200:20, 24 201:5,18,24 204:2, 4,10 207:15,20 209:6, 13,18,24 211:9,24 217:3,17 218:16 220:1,11,18 221:5 222:7 226:2,5,8,9 229:17 230:1 234:12, 16 240:2 243:16,18,24 244:19,24 247:16 248:8,22 249:2,11,15 252:1,3</p> <p>exhibits 65:20 82:6 97:21 145:16</p> <p>exist 35:15 95:4 224:23</p> <p>existed 23:15 114:6 207:10</p> <p>existing 95:17</p> <p>exists 149:21</p> <p>expect 69:18 114:1,3 193:21</p> <p>expectations 102:15 105:17 122:13,16 123:8</p> <p>expected 69:6 105:3</p> <p>expending 67:22</p> <p>experience 120:3</p> <p>experienced 147:1</p>
---	--	---	--

Experiential 108:13 expertise 15:1 175:21 210:8 experts 176:3 explain 21:16 explanation 119:23, 24 exploratory 170:5 expressed 184:16 192:13 193:18 218:7 224:20 230:14 expressly 184:9 extended 77:23 extensions 117:13 extensive 78:19 121:12 extensively 36:20 extent 12:18 57:18 112:16 113:6 193:19 242:14 253:7 254:15 eyes 152:17	factors 37:19 facts 169:6 227:1 faded 36:21 72:22 235:2 failed 221:8 fair 7:12,13,24 19:4 26:21 30:21 40:10 41:23 48:6 53:23 54:9 59:14 63:1 68:5 79:8 80:17 98:11 104:7,11 135:9,13 136:18 142:18 148:12 150:3 163:6 171:19 182:23 185:16 197:4 198:14 199:3 203:21 204:17 230:5 236:24 238:2 242:13 fairly 96:3 198:18 215:18 221:15 236:14 fall 18:16 64:9 225:20 familiar 31:15 166:21 167:1 familiarize 29:1 family 127:8 fashion 114:5 147:22 211:21 faster 75:9 83:5 favorable 205:18 features 150:9 February 40:3 41:18 134:21 142:15 183:21 185:1 239:6,20 240:17 fee 20:4 feedback 62:24 161:15 171:5 feel 46:12 129:23 132:19 169:14 feelings 131:19 205:18 felt 86:19 131:15 203:11 204:18 205:10 field 46:13 171:10 fielding 86:13 figure 173:19 185:6,9	206:4 file 68:18 234:2 filed 41:18 179:21 206:12 207:1 215:4 229:7 253:2,9 files 38:13 final 113:10 163:14 202:9 finalized 161:11 finally 172:5 236:9,10 finances 138:8 financial 67:20 80:3 117:1 financially 73:13 find 38:13 177:19 fine 75:18 162:9 190:11,13 finish 7:18,21 8:14 42:15 49:24 81:24 89:6 140:7 181:6,8 finished 60:4 82:10 111:1 225:16 253:17 fire 115:18 firm 14:5,7,22 15:3 166:17,18 fiscal 138:8 143:13 fit 46:13 144:21 171:8 225:20 fits 79:15 fix 113:8 flawed 87:19 floor 224:5 Florey 166:17,18 167:13,18 168:12 169:11,16 Florey's 166:21 Florida 13:4 14:8,11 27:21 146:24 Floyd 195:3 focus 28:11 68:12 69:5 91:5 107:18 172:5 195:5 221:20	224:10 239:21 focused 106:18 143:5 focuses 102:5 folks 69:6 97:16 follow-up 135:7 142:7 171:17 220:3 foot 97:24 98:18 for-rent 224:3 for-sale 224:3 forays 92:14 foremost 16:20 forgot 222:17 form 40:8 83:5 114:5 187:15 198:17 formal 41:15,18 91:8 96:4 98:14,20,24 102:8 format 43:11 44:23 45:2 46:11 formed 56:18 78:24 106:20 forms 21:18 117:14 forthright 211:2 forward 47:20 87:9 99:12,18 124:11 130:13,17 137:22 148:7,10 149:15 158:9 161:17,22 189:21 194:8,11 207:20 248:12 forwarded 144:12 186:18 forwarding 72:9,12 142:10,23 190:22 found 67:2 161:1 169:22 founders 50:10 fourth 174:1 fractious 118:3 155:4 frame 77:2,23 78:21 86:24 87:3 125:11,18 127:12,13,18,22 129:10,12 131:3 237:1
<hr/> <p style="text-align: center;">F</p> <hr/>			
face 243:23 253:14 facilitate 130:14 148:5 155:13 223:3 facilitated 148:24 facilitating 19:2,12 20:16 138:1 facilitation 146:10 facilitator 104:10,13, 22 105:1,4,10 106:10, 24 107:3 147:17 185:4 facilitator's 106:17 facilitators 104:6 105:11,24 146:7 184:12,17 facility 27:12 28:19 98:1,19 108:15 fact 36:8 66:5,23 111:12 137:10 138:12 226:15 242:23 251:3			

<p>252:16,21</p> <p>framed 106:12,15</p> <p>framework 136:2,10, 12,13,19,24 137:22 138:24 139:5 140:19 157:3,15 215:16</p> <p>framing 138:2</p> <p>Frank 40:23</p> <p>Franklin 72:4</p> <p>frankly 26:11 172:24</p> <p>free 167:24</p> <p>frequently 228:22</p> <p>Friday 103:8 125:2</p> <p>front 27:10,15 83:18 89:11 226:6</p> <p>frontage 95:9</p> <p>frustrated 37:14 80:23 83:21 155:23</p> <p>fulfilling 20:13</p> <p>full 8:22 9:5 40:17 124:6 170:24</p> <p>fully 33:13</p> <p>function 17:14</p> <p>functions 58:5</p> <p>fund 135:23</p> <p>funding 37:18</p> <p>funds 67:14 72:3,13, 21,24 73:11,17,18,21 74:13</p> <p>future 14:20 27:2 33:17,20 35:12 36:5 39:5 58:14 59:13 86:2, 16,17 87:18 123:6 139:19 147:13 161:7 224:13 225:8 251:22 252:19</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>garner 43:15,18</p> <p>gas 41:10</p> <p>gave 66:19 159:7 168:23 214:3 217:1</p>	<p>218:22 229:12,15</p> <p>Gay 239:13</p> <p>general 15:2 118:21, 23 120:6 156:9 215:16</p> <p>generalizations 120:2</p> <p>generally 15:17 21:3, 17,20 23:24 64:13,24 80:4 90:3 92:3 103:14, 15 106:23 113:20 119:15 156:18 189:1</p> <p>generate 120:8,9</p> <p>generated 118:20</p> <p>generation 114:10,12 115:22,23 116:21</p> <p>genesis 35:5,9 168:6</p> <p>geography 13:14</p> <p>George 195:3</p> <p>Giant 41:9 49:16</p> <p>give 9:5 23:10 31:17, 23 76:11 87:5,6 97:7 100:21,22 105:10 108:24 128:20 164:1 168:18 172:10 176:4 191:14 193:15 206:2 223:5</p> <p>giving 8:14 171:11 220:19</p> <p>glad 31:21</p> <p>glass 53:10</p> <p>goal 59:10,23 160:19</p> <p>goals 59:15,21,24 79:15 80:21 85:19 102:11 155:21</p> <p>good 6:6,9 12:24 17:13 44:12,17 48:3 67:9 70:14 72:11 83:12 86:22 102:3 105:23 106:8 116:24 128:6 132:6 143:11 144:4 167:5 169:23 172:19 177:5,22 180:2,6 210:8 215:17 216:3 217:6</p> <p>gotcha 20:18 75:7 153:17</p>	<p>govern 123:13</p> <p>government 14:4 121:9 143:11</p> <p>governments 117:2</p> <p>grabbed 97:21</p> <p>graduate 15:9</p> <p>grammar 137:9</p> <p>grandmother 26:4</p> <p>grant 72:2,13,21,24 73:11,17,18,21 74:4 75:3</p> <p>great 8:9 10:14 26:6 123:6 180:8</p> <p>green 29:24 30:5,9 34:3 50:10 72:14 74:7, 15 79:7,15 80:10,17 81:1 84:2,7 135:24 219:7</p> <p>Greeson 6:1,8,9,23 8:18 10:1,22 13:1 15:4 21:5 25:4 26:9 29:23 31:4,9 39:23 48:15 51:18,23 52:1,22 53:3 54:22 56:2,12 60:16, 22 65:12,23 68:10,15 71:9 75:23 81:6 83:7 88:4,11 89:2 91:3 97:14 100:15 101:7 123:20 125:6 133:12 134:13,14 142:4 145:20 151:14 163:18 165:6 166:14 170:2 179:14 180:14,21 181:13 183:9 185:22, 24 190:16 195:20 196:20 197:20 200:3, 23 209:11,19 212:2 218:23 219:10 220:24 223:21 228:8 232:16 234:11 240:6 241:10 253:14 254:12</p> <p>Greeson's 212:1</p> <p>Griswold 108:13</p> <p>grocery 41:9 46:11</p> <p>ground 7:3</p> <p>group 43:18 56:16 77:21 85:2 103:7 105:16 121:21 156:22</p>	<p>166:3</p> <p>groups 79:1,3 138:5, 14</p> <p>growth 13:12 25:23 115:3 149:22</p> <p>guardian 49:3 196:18</p> <p>guess 28:22 51:9 54:6 74:21 127:14 203:22 205:11 208:16</p> <p>guidance 84:18</p> <p>guide 21:24 29:21 34:15 66:20 69:11 112:23 123:3</p> <p>guided 33:16,20</p> <p>guidelines 45:18 46:23 47:8 203:10</p> <p>guiding 22:4,21 39:5</p> <p>guys 64:20</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>half 148:17</p> <p>Hall 32:8 46:4 149:7 150:9</p> <p>hand 48:11 141:23 228:5 252:6</p> <p>hand's 252:7</p> <p>handed 31:4 39:23 51:18 54:22 56:2 65:5, 13 68:10 71:9 75:23 89:2 91:3 97:3 100:15 145:21 148:17 166:14 169:9 170:2 175:9,10 180:14,21 190:8,16 195:20 200:23 209:12 234:11</p> <p>hanging 60:16 134:12 163:9,13,18 209:11 243:15</p> <p>Hang 180:17</p> <p>happen 188:7</p> <p>happened 38:13 59:20 70:18 99:10 183:1,7,8 189:18 191:18,21 205:5 240:14 253:24 254:8</p>
---	---	--	--

<p>happening 62:12 91:15,16 129:17 140:5 195:7 231:9</p> <p>hard 44:16 46:12 53:9 84:11 129:4 168:19,21</p> <p>Harlowe's 160:9</p> <p>Harris 71:11</p> <p>Hart 191:2,24 192:21 194:15 197:15 199:1, 10 228:23 229:18 231:2</p> <p>Hart's 196:12,23</p> <p>head 8:3 234:17</p> <p>health 143:13</p> <p>hear 75:10,13,15 140:9 205:11 224:18 225:10</p> <p>heard 18:18 46:19 49:1 75:18 96:18 106:16 139:14 159:23 164:23 199:24 224:8 227:20 239:17 243:3</p> <p>hearing 73:6 113:18 198:12 199:3 231:16 232:17,19 238:17 239:2,4,18,21 241:14, 17 243:1,2,3 244:6 246:15 247:19 248:13 249:16</p> <p>hearings 240:22</p> <p>heart 149:6</p> <p>heavily 238:21</p> <p>heels 248:15</p> <p>height 218:1</p> <p>held 13:3,10,19 25:15, 17,18 86:3 87:2 108:4, 6,10,11,12 138:14 147:14 149:10 155:7, 14,15 199:1 230:22</p> <p>helped 105:16 152:1, 15</p> <p>helpful 49:22 50:2 135:12 171:12 245:14</p> <p>helping 14:16 18:7 20:8 147:2 155:19</p>	<p>helps 149:13</p> <p>Henry 6:8</p> <p>Herb 105:20 146:17</p> <p>Herbert 161:8</p> <p>hereinafter 6:2</p> <p>hey 22:17 128:13</p> <p>high 25:15,17,18 26:13 36:2,4 45:20 50:21 92:22 93:10,21 94:18 95:9 98:1,15 110:15 146:22 149:7 150:10 151:2</p> <p>high-quality 34:8</p> <p>higher 37:10 223:13</p> <p>highlighted 190:10 191:15,16</p> <p>highly 147:12 161:2</p> <p>hire 23:18 126:10</p> <p>hired 16:9 50:24 119:3 147:23</p> <p>hiring 48:1 128:23</p> <p>historic 46:8 150:19</p> <p>history 35:22 38:15, 18 75:9</p> <p>hold 101:24 204:13</p> <p>holds 21:13 101:12</p> <p>holiday 28:14</p> <p>home 36:23 99:23 110:9 112:14 119:9</p> <p>homes 46:3 93:14 176:8</p> <p>honest 143:11</p> <p>honestly 71:2 248:14</p> <p>honored 39:11</p> <p>hour 52:22 180:2</p> <p>house 37:24 225:19</p> <p>housed 30:8 32:7</p> <p>housing 37:23 115:8 117:9,12,14 118:9 119:7 214:13 217:18 218:1,3,4,9 221:3,22 222:5 223:11 224:14,</p>	<p>23 227:3,5 228:1 230:2</p> <p>huge 211:20</p> <p>huh-uhs 8:6</p> <p>humbly 120:5</p> <p>hundreds 206:1</p> <p>hungry 124:1</p> <p>Hurley 60:18,23 62:18</p> <p>Hurley's 62:3</p> <p>hypothetical 173:9 176:6,23 177:21 188:16</p> <p>hypothetically 22:14</p> <hr/> <p>I</p> <hr/> <p>idea 48:3 167:22</p> <p>ideas 232:2</p> <p>identified 106:18 132:11 184:13</p> <p>identify 107:11 113:4 147:18</p> <p>ignore 149:5</p> <p>imagine 46:11 55:18 141:13 152:11 173:11 213:16</p> <p>imagining 73:14 121:10 129:3</p> <p>impact 114:23 143:13 178:5,6 247:9</p> <p>impacted 150:16 177:3 210:9</p> <p>impactful 215:7</p> <p>impacts 115:23 120:9 143:8</p> <p>impetus 250:8</p> <p>implement 161:20 162:2</p> <p>importance 114:22</p> <p>important 7:14,17 8:21 29:15 35:10,20 36:8 44:6,11 46:8,10 47:6 50:8 55:19 69:13</p>	<p>70:13 91:16 112:12 114:18 115:5 117:4 148:8 149:10 150:7,15 157:9 193:4,7 194:1 223:8 250:4</p> <p>imprecise 82:14</p> <p>improve 67:6</p> <p>improved 215:19</p> <p>Improvement 38:23 39:2</p> <p>improvements 51:2</p> <p>in-depth 167:1</p> <p>inaccuracies 113:4</p> <p>inaccurate 113:7</p> <p>inadvertently 188:3</p> <p>inartful 161:24 248:6</p> <p>inch 148:18</p> <p>include 14:13,14 22:6, 8,9 80:8 253:7</p> <p>included 39:18 74:16 80:2 183:21 185:1 226:21 236:7</p> <p>includes 120:20 180:24 201:11 224:12</p> <p>income 44:9,10 115:6, 22 119:8 176:10</p> <p>inconsistent 43:11 44:3</p> <p>inconvenient 67:3</p> <p>incorporated 246:5</p> <p>increase 33:15</p> <p>indication 248:9</p> <p>indications 248:19</p> <p>indirect 96:10,14</p> <p>Indiscernible 97:9</p> <p>individual 129:7 130:19 131:3</p> <p>industrial 117:17</p> <p>influence 173:22 174:21 246:13</p> <p>influenced 174:17 247:8</p>
--	--	---	--

<p>info 142:7</p> <p>inform 22:5 30:13 86:15 91:15 118:3 130:14 138:16 149:13, 14 153:7 155:12 160:20 168:17 193:12 237:9</p> <p>information 20:7,14 21:12 23:10 64:1 79:18,19 80:3 86:15 121:18 122:3 130:14 135:16,17 138:2 144:4,7 153:6 160:16 168:18 171:11,23 174:23 176:24 193:15 211:20 223:4 228:19 246:4 254:16</p> <p>informed 20:15 130:16 156:23 199:12</p> <p>informing 55:19 117:23 128:3,4 138:1 139:10</p> <p>Ingram 6:5,10 23:22 24:20 25:2 31:2,3 35:7 39:22 42:9,14 43:8 48:10 49:1,6 51:17 52:21 53:2 54:21 56:1 60:15 65:15,19,22 68:9 71:8 75:14,22 76:13 81:16,19,24 82:4,11,23 83:3,6 87:24 88:3 89:1 91:2 94:12,15 97:2 100:14 104:17 109:16,20 118:17 123:20,24 124:6,11,18 125:5 126:4,6 127:19,21 132:16 134:11 140:2 141:22 145:14,19 151:2,6 166:13 170:1 177:16 178:19,23 180:1,6,13 185:20 190:8,13,15 195:16 196:17,19 198:5,16 200:22 201:17,22 209:9 212:3 217:13 220:23 222:15 225:15 226:2 228:8,13 229:8 230:16 239:24 240:2, 4,19 241:3,5,9 252:24 253:10,13,17 254:12</p> <p>initially 56:19</p>	<p>initials 53:12,18</p> <p>initiate 73:23 126:10</p> <p>input 59:11 62:14,15 63:24 67:11 111:3,8, 18 133:2 172:10 177:11,14</p> <p>inputs 174:7 177:12</p> <p>inquiries 208:4</p> <p>insight 147:5</p> <p>insights 131:11 223:5</p> <p>inspections 19:22</p> <p>instance 16:15 39:7 106:2 107:8 117:9 126:18 160:3 251:11</p> <p>instances 93:4 104:22 105:8,9 107:9 157:1,12,13</p> <p>instigate 63:22</p> <p>instructed 248:24</p> <p>insufficiency 222:5</p> <p>insufficient 230:3</p> <p>intend 188:11</p> <p>intended 141:1 248:7</p> <p>intense 128:9 133:3</p> <p>intention 247:24</p> <p>intentions 153:4</p> <p>interact 123:4</p> <p>interacted 13:10 57:1 158:20 166:1 228:21, 23</p> <p>interacting 18:5 174:18,19</p> <p>interaction 37:11 133:18,20 174:16 178:8 194:3 229:11,18 231:1</p> <p>interactions 133:13 234:4</p> <p>interest 56:19 63:21 65:2 80:17 88:8 92:15 107:12 129:19 158:22 160:1 189:21</p>	<p>interested 58:21 64:5 67:1 77:6 85:14 90:11 99:18 131:4</p> <p>interests 80:14,16 160:6 192:13 199:21 200:14</p> <p>interject 231:6</p> <p>internal 69:11 70:1 72:23 74:2 121:8 207:7</p> <p>internally 73:5 157:20</p> <p>International 15:13</p> <p>interpose 220:8,12</p> <p>interposing 253:6</p> <p>interrupted 118:13</p> <p>intervals 36:22</p> <p>intervening 24:21</p> <p>interview 106:17 176:2 185:4</p> <p>interviewed 57:12,18 107:4 164:21</p> <p>interviewing 163:11</p> <p>interviews 57:15 106:9</p> <p>introducing 225:4</p> <p>invades 242:15</p> <p>invited 28:20</p> <p>involved 14:24 20:13 57:4 85:10 92:11 99:24 100:5 130:23 147:21 152:12 158:5 168:9 176:14 209:23 234:20 235:3 238:21 244:18,24 245:7,13,22 246:1 250:20,22 251:1,10</p> <p>involvement 39:11 61:15 69:4 88:19 166:5</p> <p>involving 111:19 193:20 238:23 242:10</p> <p>issue 36:17 37:7,8 77:22 84:24 90:3,6 96:2 100:1,2,4 112:13 113:19,23 114:15</p>	<p>132:20 133:1 150:2 161:2 171:21 172:5 186:11,13,15 193:4 210:21 229:4</p> <p>issued 55:6,13,16 174:2 201:24</p> <p>issues 36:24 37:12 38:1,15 61:12 74:22 94:3 102:6 106:11 107:11,14 112:24 147:20 184:13 192:1 214:23 217:9 218:4</p> <p>italics 77:14</p> <p>item 239:21</p> <p>items 106:4</p> <p>iterations 92:24</p> <p>iterative 231:4 232:2</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>Jane 105:14</p> <p>January 31:11 89:4 151:16 159:18 162:12, 21 164:24 170:4 171:18 174:3 181:1,20 182:17 235:19,22,23 236:18,22 237:13 239:17 240:18,24 241:13 243:1 244:1 247:19,21,22 248:12 249:12 251:20 252:22</p> <p>Jeff 71:11</p> <p>Jenkins 105:15 145:24 146:7</p> <p>job 42:19 67:9 75:18 90:10 115:3 177:5 215:13,17 216:3 217:7,8,22</p> <p>jobs 44:10 115:6 127:8</p> <p>jog 133:7</p> <p>jogging 50:3</p> <p>jogs 41:2 57:9 90:19 198:20</p> <p>join 78:21</p> <p>joined 92:9</p>
--	---	--	--

<p>Julia 105:19</p> <p>July 61:4 66:8 71:12</p> <p>jump 91:1 213:19</p> <p>juncture 112:19 153:3 167:8 205:2 211:11 248:5</p> <p>junctures 129:12</p> <p>June 51:21</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>K-O-W-A-L-C-Z-Y-K 134:21</p> <p>Kass 40:23 41:1,7</p> <p>Katherine 50:24</p> <p>keeping 44:22,23</p> <p>Kettering 25:10,22 26:5 29:5,8</p> <p>key 16:16,19 103:6 112:13 152:11 184:13</p> <p>kids 37:9</p> <p>killed 195:4</p> <p>kind 25:20 33:8 35:4 57:22 64:20 70:12 73:3 78:22,24 80:4 92:18 106:16,20 112:23 117:14 121:9 122:23 128:6,14,21,24 129:2,3 130:15 137:20 138:16 147:6 150:11, 16,21 159:10 171:3 172:4 176:11 244:15 248:15</p> <p>kindergartener 26:4</p> <p>kinds 117:12</p> <p>knew 12:18 29:11 44:5 153:3 158:14 200:13 238:5</p> <p>knowledge 70:24 74:11 96:11,14 100:4 141:4,8 177:10 179:14 219:16 227:22 246:24</p> <p>Kowalczyk 133:15,19 134:20 135:2,8 136:7</p>	<hr/> <p style="text-align: center;">L</p> <hr/> <p>labels 203:16</p> <p>lack 127:14 130:8 154:14 155:1,2 156:9, 10 230:3</p> <p>land 13:6,11 14:23 27:14 63:14,21 65:9 93:19 95:5 119:12 120:8 165:17 183:24 215:8 217:17 218:10, 11 219:24 221:4,5,23 222:7 223:20 225:3,21</p> <p>landowner 127:16</p> <p>language 8:3 200:15 203:16</p> <p>large 24:3 43:10 44:22 45:1 46:11,13 63:13 67:22 87:2 139:14 149:2,13 165:17</p> <p>large-scale 114:21</p> <p>largely 51:5,6 119:10 160:4 229:19</p> <p>larger 25:14 70:10 92:20 93:3 99:17 139:19</p> <p>largest 149:8</p> <p>Larrimer 92:22 93:10, 21 94:18,24 98:15</p> <p>late 212:5 237:17 238:1,3</p> <p>launch 128:17</p> <p>launched 148:21</p> <p>launching 54:24</p> <p>law 22:1,6 39:15 54:1 103:5 108:17 110:6 123:19 152:3,9,17 166:17,18 168:24 188:4 191:1 203:10 234:23 244:10</p> <p>laws 100:1 203:9</p> <p>lawsuit 253:1,9 254:8</p> <p>lay 178:23</p> <p>laying 215:13</p>	<p>LC 6:14,17 36:1 74:18 93:15 153:13,24 154:6 155:15 157:4 158:20, 22 159:24 194:7 196:4</p> <p>LC's 26:18 242:24</p> <p>lead 33:9</p> <p>leaders 78:13</p> <p>leadership 111:21 112:8,16 138:5 143:16 144:16</p> <p>leading 15:23 159:18 166:5</p> <p>learn 28:6</p> <p>learned 88:18</p> <p>learning 28:18</p> <p>lease 27:13</p> <p>leave 10:7 25:8 254:17</p> <p>leaving 216:9,13</p> <p>led 37:1 77:21 95:21 96:6 109:7,8 184:17</p> <p>Lee 17:17 71:11 89:3 94:4 98:17 190:23 209:14</p> <p>left 13:20 37:9 125:20 139:16,18 164:5,8 168:22 179:17 182:11 214:4 252:9,11,24</p> <p>legal 22:22 169:4,16 246:11</p> <p>legally 23:6</p> <p>lesson 75:9</p> <p>letter 51:20 52:2,5,10 53:4,8,21 54:9,12 63:2,8</p> <p>letterhead 40:6 68:13 166:18,19</p> <p>level 38:17 146:22 215:20</p> <p>levels 37:1</p> <p>liaison 61:17</p> <p>life 29:15 36:22 50:8 115:1 119:14 126:23 194:24 195:7</p>	<p>Lifestyle 6:12,14,16 36:1 86:8,24 87:13,14 96:12 99:23 126:9,14, 19 140:16 154:6 158:13,14 160:3 177:10,19 178:8 179:11 192:18 193:21 206:12 228:16 230:11 231:2,20 233:11 239:1,4,15 241:13,16, 21</p> <p>Lifestyle's 26:10 88:8,19 120:22 127:11 177:13 179:20 222:6 225:19 226:4,6 234:5, 9 247:18</p> <p>Lifestyles 70:21 89:24 139:5,12,24 140:24 154:11 159:13 173:14 191:3 193:10 199:19 200:4 206:19 247:19</p> <p>likelihood 175:23 238:11</p> <p>likewise 7:20</p> <p>limited 63:12 74:12 172:3</p> <p>Lindsey 229:20 235:3 236:23 238:19,24 242:9,11 246:18</p> <p>Lindsey's 192:21</p> <p>lines 115:18</p> <p>Linworth 108:12</p> <p>list 109:16</p> <p>listed 71:18 116:3 189:10 215:24</p> <p>listen 83:13</p> <p>listened 39:12 223:16 232:21</p> <p>listening 94:14 214:21 224:17</p> <p>litigation 126:5</p> <p>live 239:13</p> <p>living 27:12 34:4 224:6,20 225:4,10 227:10,20</p>
--	--	---	--

<p>local 14:4 121:9</p> <p>located 150:8</p> <p>locating 80:9</p> <p>location 150:14</p> <p>logistics 186:10 189:16</p> <p>long 25:16 29:23 69:9 124:4 133:1 232:10 239:9</p> <p>long-range 18:22</p> <p>long-term 34:11</p> <p>long-winded 120:5</p> <p>longer 33:7 34:19 37:23 171:22 222:22</p> <p>Longfellow 95:1</p> <p>looked 92:21 123:11 175:23 183:12 189:17 201:13 234:24</p> <p>lost 70:13 225:2</p> <p>lot 13:11 27:9 35:11 36:4 44:19 52:23 57:1 59:20 60:11 66:19 70:10,16,17 83:5 85:23,24 92:4,18 94:23 98:6 99:19 102:13 122:7 126:22 127:9 128:10 131:18 133:2,3 138:6 147:13 154:15 157:19 195:2,5 200:15,16 205:12,23 208:11 214:5 238:23 240:13 249:6</p> <p>lots 19:23 133:13 206:2 224:21</p> <p>love 67:7</p> <p>lower 53:16 151:9</p> <p>lunch 124:2,19 125:7</p> <p>luncheon 124:21</p> <p>Lynda 31:10</p>	<p>177:4,23 189:23 192:16 207:8 210:4 214:10 221:11 247:3</p> <p>magnifying 53:10</p> <p>mail 182:11</p> <p>main 58:5</p> <p>maintain 63:13 103:16</p> <p>maintaining 150:19</p> <p>maintenance 67:24 115:19 117:13</p> <p>major 15:6 111:16 150:12 193:14</p> <p>majority 130:10,11,22 132:7 143:16 206:5 250:5</p> <p>make 7:5 8:7,24 16:15 18:14,17 20:15 21:10 42:12,19 44:16 46:5, 12 60:3 67:12 70:12 83:9 113:21 117:2 130:16 137:3 152:18 154:16 158:14 171:11, 24 172:21 187:6 188:24 197:24 198:13 210:3 216:5 222:24 223:6 230:8 246:17</p> <p>makes 20:18 38:22 75:7 113:2 137:4</p> <p>making 16:13 18:1 84:1 95:5 176:4 187:2 211:19 232:6</p> <p>mall 46:6 50:20</p> <p>management 13:13 14:10 15:2,14 37:4 65:1 100:17 101:20 103:9 104:2 105:18 108:19 113:7</p> <p>manager 10:3,5,9,11 13:2,9,17,21,22 15:14, 18,19 16:8,9,15 17:3,9 22:16 25:3,9,16 28:5 29:2,4 30:20 32:13 38:7,8 55:5 58:16 69:5 70:5 99:20 103:5 111:20 130:9 133:12 148:4 172:9 203:7 210:20 211:13 222:22 249:18 251:19</p>	<p>manager's 16:16 32:8 114:4 137:24 195:7 223:2</p> <p>managers 14:17 117:1</p> <p>managing 15:23 195:1 229:11</p> <p>manner 187:7</p> <p>manufacturing 119:10</p> <p>March 68:19,22 91:6 142:1 146:2 186:1 253:2</p> <p>mark 30:11</p> <p>marked 30:23 31:5 39:20,24 48:8,11 51:15,19 54:19,23 55:23 56:3 60:9,17 65:8 68:7,11 71:6,10 75:20,24 88:23 89:3 90:23 91:4 96:24 97:3 100:12,16 134:9,12 141:20,23 145:7,21 161:9 166:11,15 169:20 170:3 180:11, 21 185:18,22 190:6,17 195:14,18,21 200:20, 24 209:6,12 234:12 239:23 240:8 243:16</p> <p>market 34:10 224:15, 24 225:5</p> <p>marketing 38:11 77:20</p> <p>Marlowe 105:20 146:18,24 148:12 149:16 155:17 158:3, 17 159:6 160:10,11,12 161:1,8,21 162:15 163:5</p> <p>Marlowe's 148:14 157:2,22 160:8,12</p> <p>Martin 145:23 146:7</p> <p>Marty 105:15</p> <p>masses 215:1</p> <p>master's 15:7</p> <p>materials 20:5,22</p> <p>Matt 186:9</p>	<p>matter 9:22 11:4 47:20 131:9 165:15 205:1</p> <p>matters 16:4 45:11 47:11 169:16 189:1,9 195:3 222:21</p> <p>Matthew 6:1,8</p> <p>maximize 62:7</p> <p>meaning 45:20 160:1</p> <p>meaningful 64:22 214:15 230:4</p> <p>means 81:2 84:6 198:6 200:16</p> <p>meant 34:19 97:22 164:18</p> <p>medical 97:24 98:19</p> <p>medication 8:24</p> <p>meet 21:14 22:19 23:12 44:2 86:20 199:9,11</p> <p>meeting 11:22 12:1,2, 7,10,14 20:20 62:17, 18 76:21,23,24 77:1,3 87:2,7 88:15 102:9,24 103:2 107:20 108:16 111:12 113:19 155:15 160:19 182:17 187:3 188:4,10,21 189:3,11, 12,13 190:2,4 191:19, 21,22,24 192:6,21 193:23,24 194:14,16, 19 195:9 197:15 198:24 199:2,13,17 200:18 231:15 235:20 236:13,14 237:14,20 239:5,7,12 240:18,24 243:8 247:5 251:21</p> <p>meeting's 188:15</p> <p>meetings 11:16,18,23 43:9 77:2 78:8 91:21 92:1,2,4,5,10 102:19, 20,22 108:17 123:13 138:13 155:15 158:5 192:4 193:9</p> <p>member 22:18 61:23 76:5 165:21 166:2 181:19 182:5 227:22 237:13,24 238:5</p>
--	---	--	--

M

made 11:5 16:2,10
41:14 62:5 66:7
102:10 172:20,22,23

<p>members 18:6 39:10 77:5 85:1 87:16 91:6 97:5,15 103:1 107:4,5 121:16,20 129:7 130:19 131:3 133:14 142:16 144:4 152:7,9 155:14 156:15 166:3,6 181:1 186:20 190:18 195:22 243:10</p> <p>memo 33:22 34:22 35:6,8 36:6 38:5,9 43:5 47:15 48:5 62:3 89:10 152:7,9 154:4 155:22 167:15 173:5,7 174:5 212:12,16 216:2,8,10,23 217:21 218:24 221:12,15 223:5 224:7 226:9,21 227:2,13 229:14 246:6,11</p> <p>memo's 216:20</p> <p>memorandum 20:12 31:8,9,16 32:15 36:12 40:2,5,10,20 47:24 56:3 60:17 61:3 62:13 100:16 101:3,20 110:11 112:6 113:4 151:8,15,17,22 152:5, 20 153:9 170:3 171:18 173:3 201:12,24 209:13 210:11 211:9 212:6 213:13,21 219:20</p> <p>memory 28:1 33:3 41:2 50:3 57:9 66:17 69:15 70:19 72:22 90:19 95:22 98:20 99:7,13 105:23 128:8 133:6,7,19 137:4 152:13 156:23 157:24 171:2 173:17 174:18 187:16 198:19,21 205:11 210:14 211:5 235:2 238:24 242:3,5, 18 250:14</p> <p>memos 60:11 80:11 167:24</p> <p>mental 9:12</p> <p>mention 6:16 46:19 64:8</p> <p>mentioned 6:10 10:1 36:15 50:14 118:18</p>	<p>129:5 146:6 155:13 159:1 165:6 233:7</p> <p>message 76:20,22 186:18</p> <p>met 6:9 10:24 41:20 43:5,6 78:17 85:2 155:14 157:23 158:2 159:5 160:17 169:12 184:12</p> <p>metadata 68:18,21</p> <p>Methodist 99:22 112:14</p> <p>meticulous 31:13</p> <p>Michael 76:18 142:1 144:13,24 182:1,12, 15,22 183:15,17,19 186:1,9,12,16 207:24 208:5</p> <p>Michael's 184:3,22 185:12 186:4</p> <p>microcosm 150:2,5</p> <p>Miller 239:5 240:17,24</p> <p>million 72:3 201:9</p> <p>mind 27:15 194:21 216:14 222:5 227:5</p> <p>mind-set 201:20</p> <p>mine 137:2 203:3</p> <p>minute 65:11 76:11</p> <p>minutes 11:16,22,24 12:2,14 100:23 102:24 190:2,4 192:3 231:15 232:20 233:1</p> <p>misheard 46:15</p> <p>misleading 82:18</p> <p>misquote 82:16,21 109:18</p> <p>misquoted 82:12</p> <p>misread 196:15</p> <p>missing 40:7 227:6</p> <p>mission 30:9 33:8 35:16</p> <p>Misstates 74:9</p> <p>misunderstood</p>	<p>113:19</p> <p>mix 50:12 224:2,3 226:15,22,23</p> <p>mixed-use 24:3</p> <p>MKSK 34:24 35:5 51:20 52:6,14 53:5 55:14</p> <p>MKSK's 52:10 55:15 57:11</p> <p>modifications 113:16</p> <p>modified 123:11</p> <p>modify 164:6</p> <p>moments 122:15</p> <p>Monday 191:8,19,21 194:16 238:4</p> <p>money 16:21 67:22,24</p> <p>month 28:10 30:3 144:12</p> <p>monthly 233:14</p> <p>months 232:1 252:11</p> <p>moratorium 234:18, 21 236:24 237:3 238:6,17 239:22 241:11,20 242:12,23 243:8,11 246:11 248:16 249:19,23 250:8,12,24 251:4,6</p> <p>moratoriums 249:22</p> <p>morning 6:6,9 7:15 52:20 125:13 170:17 204:9</p> <p>motion 62:5 186:6 187:3,6,12 188:14,17 189:23 192:17</p> <p>move 24:21 25:14 27:19 130:11,13,17 148:7,10 189:20 194:8 248:11</p> <p>moved 27:21 28:4 29:4 30:18 127:8 161:17,22</p> <p>moves 47:20 149:15</p> <p>moving 70:11 96:3 99:18 137:22</p>	<p>MPC 11:24 12:10</p> <p>multifamily 120:17, 18</p> <p>multiple 46:3 155:6</p> <p>multitask 83:12</p> <p>municipalities 119:7</p> <p>Myers 76:1,5 84:5,6 142:1 144:14,24</p> <p>Myers' 80:23 83:17,23</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>napkin 121:8 128:13 129:2</p> <p>narrative 215:2</p> <p>narrow 171:10</p> <p>natural 150:9</p> <p>nature 70:6 103:19 201:2 202:8 220:13</p> <p>navigate 147:3 155:11</p> <p>necessarily 22:5 50:7 112:23,24 179:24</p> <p>needed 36:7 44:1 73:7 74:23 106:18 117:5 143:18</p> <p>negotiations 126:2</p> <p>neighborhood 37:13 46:2 57:10 150:10 225:2 227:17</p> <p>nerds 121:9</p> <p>newly 142:11</p> <p>newspaper 38:12</p> <p>night 103:9 188:20</p> <p>night's 187:3</p> <p>nods 234:17</p> <p>nomenclature 77:19</p> <p>nontechnical 203:6</p> <p>normal 137:2</p> <p>north 50:21 150:11, 20,24</p>
---	---	--	--

<p>notable 194:12</p> <p>notes 104:11 143:6 191:7 233:20</p> <p>notice 28:6</p> <p>notify 239:1</p> <p>noting 84:5</p> <p>notion 203:4</p> <p>Novak 105:19</p> <p>November 166:15 181:18 209:14</p> <p>nowadays 52:18</p> <p>number 11:10,13 13:10 37:5 38:14 82:24 97:14 101:2 120:11 136:22 155:12 214:8 219:11</p> <p>numbered 31:8 39:24 48:14 51:21 55:1 56:5 68:14 100:18 142:2 146:2 209:15</p> <p>numbers 128:14</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath 9:18,20</p> <p>object 83:4 192:7</p> <p>objecting 81:12</p> <p>objection 17:19 19:5 25:11 26:1 41:22,24 42:12 43:3,22 54:14 55:17 58:18,24 67:16 74:9 81:4 83:22 84:9, 23 87:10 88:10 109:13,23 110:2,24 111:5 112:10 113:9 118:11 123:14 130:1,4 131:7 133:16 150:4 168:1 169:5 178:20,22 187:15 198:17 202:22 208:6 216:11 219:13 220:12 221:10 222:1, 8,19 225:23 227:7 235:6 238:8 242:14 253:7</p> <p>objections 83:4 178:24 214:20</p>	<p>objective 147:15 211:21</p> <p>objectively 173:21 174:21</p> <p>objectives 44:2 224:11</p> <p>obligated 86:19</p> <p>obligation 20:13 23:6, 8</p> <p>obtain 50:3 79:17 144:8</p> <p>obtained 15:5</p> <p>obtaining 74:13</p> <p>obvious 36:7</p> <p>occur 51:10 250:15</p> <p>occurred 110:5,8 115:15 191:8 231:13</p> <p>occurring 143:7</p> <p>October 125:1 201:1 202:7 206:7,9,14 232:19 254:22</p> <p>off-the-cuff 163:16 218:21 220:20</p> <p>offer 16:24 27:4 67:6 216:1,7 223:6,9</p> <p>offered 224:24</p> <p>offering 44:21 223:15 225:6</p> <p>offerings 224:16</p> <p>office 32:8 44:6 92:17 98:1,19 114:4 115:3 117:16 214:14 219:6 230:3</p> <p>offices 119:10 213:15</p> <p>official 229:13,16</p> <p>officials 41:20 43:16 56:22 57:4 79:4 190:19 195:23 211:8</p> <p>offset 115:23 117:6</p> <p>Ohio 19:22 25:15 46:7 72:3 92:19 94:23 95:2 97:24 98:6 99:13,22 100:6 108:17 117:9 119:7 123:19 162:24</p>	<p>188:4 215:9</p> <p>Ohiohealth 91:8,19 92:14,24 93:18,22 94:16 96:1 98:18 139:16 141:7 158:15 160:2 194:6</p> <p>Ohiohealth's 93:8 95:13 99:11</p> <p>Olentangy 250:7,8,9, 21 251:5</p> <p>OMCH 94:9,11</p> <p>ongoing 67:24 78:23</p> <p>online 29:13 194:18</p> <p>open 231:4 254:18</p> <p>openly 96:3</p> <p>operate 37:3</p> <p>operation 36:23</p> <p>operational 35:22 36:24</p> <p>operations 15:20 28:13,19 30:6,13,15, 19 32:23,24 33:3,6 35:20</p> <p>opinion 37:14 66:18 188:6 206:2 217:15 218:21 219:2,3 222:21 223:9 230:3</p> <p>opinions 85:14 123:6 147:10 206:4 214:24 226:14</p> <p>opportunities 15:24 16:12 28:7 33:14 34:3, 4 224:19</p> <p>opportunity 25:13,20 26:2,24 36:5 40:16 53:21 54:7 62:7 74:4 75:3 83:16 101:7 115:6 134:18 181:15 185:21 189:11 195:17 247:8</p> <p>opposed 8:6 212:20</p> <p>opposite 79:11</p> <p>option 246:12</p> <p>options 80:5 128:5 138:2,21,22 141:12,17 148:6 155:24 156:1</p>	<p>157:16,18 172:1 224:6,15</p> <p>order 12:22 34:10 74:12 91:15 97:22 124:16 148:18 176:17 178:9,15 188:24</p> <p>ordinance 234:14,18, 21 235:5,14,18 236:2, 3,7 239:16 241:16 243:21</p> <p>ordinances 22:1,3 47:7 90:12 123:16</p> <p>organization 56:24 57:22,23 58:6 163:5 165:7 166:2 174:3 195:1</p> <p>Organizational 105:16</p> <p>organize 47:16</p> <p>orient 13:15 68:20</p> <p>oriented 70:2</p> <p>original 46:7 208:12 212:14,22</p> <p>originally 170:19 235:4</p> <p>outcome 117:24 118:2 138:19</p> <p>outcomes 143:12</p> <p>outcry 37:2 38:2,9,17</p> <p>outline 21:17 141:16 198:18 217:9</p> <p>outlined 18:21 28:11 34:22 41:12 43:7 47:14 60:1 85:19 90:7 98:10 131:20 177:4 184:11 203:13 205:7 217:7 224:12 226:13</p> <p>outlines 33:24 164:10 224:7</p> <p>outlining 155:24 156:1 215:19</p> <p>outpouring 223:17</p> <p>output 51:9 143:1,2</p> <p>outreach 126:14 253:22 254:11</p>
--	--	---	---

<p>overlay 250:9,10,13, 21 251:5,8</p> <p>oversaw 16:1,5 17:12, 13 212:24</p> <p>oversee 13:7 15:20 19:21 210:7,18</p> <p>overseeing 17:10,18</p> <p>oversees 17:12</p> <p>oversight 172:15</p> <p>overview 136:1</p> <p>overwhelming 223:17</p> <p>OWA 77:4 79:1 85:11</p> <p>OWBA 57:21</p> <p>owner 73:24 128:23 178:13 200:10</p> <p>ownership 155:19</p>	<p>165:7,11,19,21 166:7 177:20 214:15 230:4</p> <p>parking 46:13 92:18 94:23 98:6 99:19</p> <p>parkland 63:5</p> <p>parks 60:18,23 61:2,6, 9,13,14,15,23 62:4,5, 20 63:12 67:4,7,9 211:16</p> <p>part 17:13 34:19 45:22 56:23 64:23 68:3 73:8 79:2 80:19 93:12,15, 19 99:19 151:9 158:1 161:1 170:20 173:11 174:24 207:4 226:19 231:12 246:7</p> <p>partially 46:1</p> <p>participants 106:17 107:20</p> <p>participate 62:15,19 121:17 122:2 172:16 173:8</p> <p>participated 57:15 166:6 211:8</p> <p>parties 90:11 126:3</p> <p>Partners 100:17 101:20 104:2 105:19 113:8</p> <p>Partners' 108:19</p> <p>Partnership 57:24 58:3</p> <p>Partnerships 14:8</p> <p>parts 70:11</p> <p>party 96:12 99:21 104:3 126:24 127:3 145:3 199:9 254:4,6</p> <p>pass 250:5</p> <p>passed 205:14 250:2 251:4</p> <p>past 191:8</p> <p>paths 138:10,11</p> <p>pausing 60:3</p> <p>pay 52:13 167:15 232:24</p>	<p>pays 117:11</p> <p>pedestrian 22:9</p> <p>pen 252:8</p> <p>pending 8:15 60:14 187:5 206:15 222:14 230:12 253:16</p> <p>people 11:5 22:20 57:10 64:19 67:7 85:10,21 86:1 112:15 117:1 131:18 138:17, 19 157:20 158:21 163:11 164:21 166:4,6 171:22 176:13 205:10, 12 206:1 214:23 224:18</p> <p>people's 214:24</p> <p>percent 44:7,9 63:4</p> <p>perfect 24:11 63:3 65:3</p> <p>perform 120:16 127:13</p> <p>performed 116:9 118:7,8 120:1,10</p> <p>period 13:8,21 25:17 30:5 33:7 37:3 38:3,8 57:3 70:23 123:23 128:8 133:1 171:7 232:10 251:6</p> <p>periodic 101:15</p> <p>periodically 35:21 123:11 146:9</p> <p>permanently 113:1</p> <p>permit 7:20 30:10</p> <p>persistent 208:4</p> <p>personal 10:21 54:17 219:15 229:15 230:2</p> <p>personally 33:22 230:15</p> <p>perspective 121:23 155:18</p> <p>pertain 13:5 127:22 149:3</p> <p>pertained 247:18 248:1</p> <p>pertaining 213:11</p>	<p>241:12</p> <p>pertains 23:23</p> <p>phases 166:16,22</p> <p>phone 23:13</p> <p>phrase 45:12</p> <p>picked 137:17</p> <p>pickup 115:20 117:11</p> <p>piece 35:10 64:1 192:10 251:9</p> <p>pieces 27:14 35:18,19 70:11 94:5</p> <p>place 22:11 49:10 50:21 77:24 220:21 225:2</p> <p>places 108:7,14</p> <p>plaintiffs 6:11</p> <p>plan 14:20 19:22 22:7, 8,9 24:1 28:11,21,23 29:9,20 35:1,13 41:5 43:12 44:3 45:1,17 46:21 47:4,7 48:2 51:11 52:15 55:15 58:11 59:6,10 64:7 65:9 66:1,10,14 67:13 69:10 85:6,20 88:14 115:4 120:22 131:16, 20 151:19 152:22 153:2 155:9 179:21 182:18 183:10,12 184:1 185:10 186:5 187:5,13 189:22 198:11 201:3 202:8,15 203:13,17 204:1 205:8,19,21 206:14, 15,20,23,24 207:11,18 208:5,12,22 214:12, 15,17,19 215:15,18 217:9,17 218:2,11,12, 15,20 219:9,24 221:4, 5,16,20,23 222:7 224:5,11 225:3,21,24 226:1,4,6,8 228:18 229:22 230:1 244:22 245:1,11 246:3,9 247:2,17,24 248:21 252:1</p> <p>plan's 203:9</p> <p>planned 24:7 51:4</p>
<p style="text-align: center;">P</p>			
<p>p.m. 124:22 125:3 254:23</p> <p>packet 175:9</p> <p>packets 18:5</p> <p>pages 105:18 201:9 244:23</p> <p>paid 167:12,17,20,21 168:8</p> <p>paper 169:8 170:6 174:2,6,10,12</p> <p>paragraph 33:12 38:24 48:21 49:8 135:21 141:6 153:9, 11,15,16,22 176:21 186:24 191:6,11,13,20 197:21,23</p> <p>parcel 63:13 95:6 99:17</p> <p>parent 95:6</p> <p>park 44:11 62:8 63:18 64:5,22 67:6,8,15,22 68:3 73:6 79:7,14 80:9,17 81:1 84:3,8 85:4,15,16 110:15 115:7 121:22,23</p>			

<p>planner 23:19 34:17 210:5</p> <p>planners 47:19 48:1 117:1</p> <p>planning 13:7 14:13, 23 17:6,21,24 18:3,9, 11,18,19,22,24 19:2, 15 20:7,9,20,23 22:18 23:8 29:12 32:6 34:20 36:8 39:3,14,15 44:17 50:18 52:17 57:2,4 67:11 68:13 69:6 80:3 87:19 128:6 147:2 184:14 210:24 211:17 212:7,9,10,12,13,21, 23 222:23 223:8 229:21 230:14 231:5, 9,16 232:2,3,8,17</p> <p>plans 22:10 24:2,6 29:18 47:4 87:2 110:7</p> <p>play 129:15 130:13</p> <p>playing 117:22</p> <p>plays 18:20</p> <p>plural 11:22 92:4</p> <p>point 29:3 30:4,17 32:9 36:20 37:16 42:7 57:6 79:16 96:8 104:1 114:9 121:21 122:21 156:21 158:5 160:17 167:1 176:14 177:22, 23 182:4,8 189:22 192:5 199:23 202:13 208:19 211:14 213:23 216:2,17 225:21 233:3 237:6 243:14 246:15</p> <p>pointed 220:17</p> <p>pointing 26:13 46:18 204:1,5 215:19</p> <p>points 27:13 89:17 111:13,16 176:15 214:8</p> <p>police 37:11 115:18 195:3</p> <p>policies 21:22 45:14 47:1</p> <p>policy 16:3,10,12,15 23:1,7 29:15 110:4 118:2 128:18 130:16 133:5 138:2 139:20</p>	<p>141:17 148:6 153:7 202:16 203:8 223:1,6 246:10,12</p> <p>political 15:7</p> <p>poorly 231:24</p> <p>portion 63:18 82:8 94:22 100:7 109:1 111:17 114:11 125:10, 17 129:9 131:5 165:18 182:18 183:10 185:10 187:4,13 198:10 209:24</p> <p>portions 176:6 210:10</p> <p>posed 25:18 36:5 151:17 197:9</p> <p>position 13:20 25:9 29:2 55:4 61:4 86:18 113:1 132:20</p> <p>positions 13:3,5,10, 19,24 132:24</p> <p>positive 117:16</p> <p>possibility 50:12 205:21</p> <p>posted 107:24</p> <p>posts 189:5</p> <p>posture 64:4 83:24 86:5,6</p> <p>potential 26:24 27:6 114:10 115:20 116:21 129:8 143:12 155:9 164:12 197:24 198:13 199:20,22 200:5,8,10</p> <p>potentially 33:9 34:5 87:19 92:12,16 119:17</p> <p>practice 102:4 137:2</p> <p>preceding 238:1</p> <p>predate 27:7</p> <p>predates 27:7 38:5</p> <p>predominantly 224:5 226:23</p> <p>preliminary 49:14</p> <p>premature 79:16</p> <p>preparation 172:16 211:9 231:14</p>	<p>prepare 10:23 36:11 110:17 137:21 172:18 193:1,8 237:7 246:24</p> <p>prepared 40:11 47:13 69:16,19 95:23 116:3 146:20 157:4 161:8 172:6,9 221:18 235:14 236:24 237:4 238:10</p> <p>preparing 11:7 18:5,8 20:23 135:15 138:23 139:4 140:19 209:23</p> <p>presented 70:6 120:23 163:15 189:2</p> <p>preservation 44:12</p> <p>president 77:9 106:24 144:16,23 182:12,15, 22 183:15 184:3,22 185:12 186:1,4,9,12 208:1,5 235:12,13,17 236:16,19 242:11 247:23 248:19 249:1, 10,14</p> <p>press 55:1,5,16</p> <p>presume 95:2 183:14</p> <p>pretty 17:24 149:17 175:11 176:22 197:6 224:12</p> <p>prevented 231:20</p> <p>prevents 124:13,14</p> <p>previous 164:4</p> <p>previously 65:8 87:1 122:4 140:11 201:12 234:12 243:15</p> <p>primarily 17:17</p> <p>primary 18:13 172:12</p> <p>prior 23:23 35:17 36:16 37:2 38:9 52:9 53:3 66:9 74:10 188:23 194:16 203:23 204:20 206:9 208:19 236:1 238:17 240:9 241:10,13,17 243:21 247:22 248:3,12 249:11,16</p> <p>priorities 102:5</p> <p>private 69:22 99:21 100:2 133:13 160:1</p>	<p>privately 132:2,3</p> <p>privilege 242:16</p> <p>pro 144:16,24</p> <p>proactive 156:11 159:15</p> <p>proactively 153:12, 24 154:11 157:5 160:5</p> <p>procedure 23:1,4 123:18</p> <p>procedures 21:23</p> <p>process 18:8 19:1 21:15,16,17,22 23:10, 13 39:10 46:24 50:19 55:1 56:14,19 60:1 62:14,16 63:24 66:22 67:11 70:13 77:21 85:12 93:7 106:21 115:16 147:7,16 148:11,15,23 149:1,12 157:3 158:4 159:11 160:13,17 161:6,14, 18,23 162:22,23,24 164:8,12,22 184:11 202:9 210:19 212:15 223:3 229:1,19 231:4, 7 232:9 237:6</p> <p>processes 147:3,19 165:3</p> <p>produce 90:19 115:6</p> <p>produced 6:16 121:22 143:21 144:5 167:7 254:16</p> <p>producing 117:8</p> <p>product 176:20 202:9</p> <p>production 254:14</p> <p>productive 147:22</p> <p>products 224:4 228:1</p> <p>professional 15:11</p> <p>professionally 93:6</p> <p>professionals 225:9</p> <p>proffered 12:13 167:18 188:5</p> <p>profile 36:4</p> <p>program 72:2,13 73:2 74:12</p>
---	--	--	---

<p>programs 16:23</p> <p>project 70:7,15 74:15 77:7 91:8 93:18,22 94:3,18,19,21 98:5,10 99:6 121:22 165:7,11, 21 166:7 210:21</p> <p>projections 175:1</p> <p>projects 14:11,12 93:24 94:16 95:13</p> <p>prompted 192:20</p> <p>properly 108:16</p> <p>properties 114:20,21 149:9</p> <p>property 24:13 26:10, 11,12,18,19,20,23 28:8,11 29:24 32:18, 21,22 35:10,16,19,24 36:1,9,23 38:11,16 39:6 41:10 45:6 55:20 56:20 62:8 63:18 65:2 67:15 68:4 69:22 70:22 72:20 73:2,23, 24 74:5,17,18 78:18, 20 79:8 80:6,10 85:17 86:17 88:9,19 90:1 92:20 93:12 94:9,10 99:15 114:20 118:5 125:10,18 127:11,12 128:19 129:14 135:9 139:19,23 140:5,13 141:1 147:11 148:8 149:5,12,23 150:1,7 155:3,21 158:16 159:14 161:7 163:2 165:12 166:17,23 170:7 178:12,14 193:5 198:10 200:10 207:19 234:22 237:4 241:12 242:24 247:18 248:1 249:20,23 250:6,11 251:10,13,22 252:20 253:23</p> <p>property's 120:14</p> <p>proportional 175:15</p> <p>proposal 43:10 44:21 53:9 98:13,15 99:11 120:22 139:13,14 158:7 178:18 194:4 206:23 223:13,19 226:16,21 227:1,12 232:11 239:2 241:12</p>	<p>243:6</p> <p>proposals 94:9 98:9 159:24 207:7</p> <p>proposed 41:21 58:10 97:24 162:22,24 188:13,14 206:13 223:12 224:3 235:4,18 236:2,6 238:6,12,17 241:16,20 242:12 243:7,11 247:11</p> <p>proposing 238:14</p> <p>prospective 49:14</p> <p>protect 110:16</p> <p>protests 195:4</p> <p>proud 26:7</p> <p>provide 8:4 21:12 34:8 69:7 86:15 91:14 104:10 105:4,24 117:19 119:13 130:14 143:17 144:3 153:6 168:19 175:14 177:20 178:1 207:16 213:2 223:3 246:3</p> <p>provided 79:13 87:1, 20 113:5 119:23 122:4 135:11,15,18 167:4,7, 10 168:8,11,17,23 169:4,7 171:18 219:20</p> <p>providing 20:7,14 116:20 138:1 175:24 224:14</p> <p>provisions 54:2</p> <p>public 10:12 13:24 15:7 18:6 21:11 38:2 55:19 86:15 87:2 102:19,20,22 108:15, 17 116:21 117:23 122:4 128:3,4 131:10 133:2,3,13 139:8,10 143:8 147:1,3,6,16 155:15 188:4,8,10 207:8 228:20 239:11 243:12</p> <p>public's 205:24 215:4</p> <p>publicly 108:1 131:12,24 199:8</p> <p>PUD 51:8</p>	<p>PUDS 24:6,8</p> <p>pulled 37:17</p> <p>purchase 63:13 67:15 88:8 99:16 125:10 127:10 129:8 131:5</p> <p>purchased 93:16,17</p> <p>purchasing 63:17 125:17</p> <p>purpose 35:15 184:21</p> <p>purposes 26:8 48:12 51:19 68:19 76:2 151:21 170:9 180:20 201:5 209:11</p> <p>pursue 90:8 126:12, 13 128:11 130:22</p> <p>pursued 59:24</p> <p>pursuing 59:21 72:21</p> <p>put 85:2 86:12 89:10 95:23 123:22 167:23 182:16 184:1 200:15 202:7</p> <p>puzzled 253:13 254:9</p> <p>puzzles 197:19</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>quality 45:20 115:1 119:14</p> <p>question 7:6,7,11,12, 19,22 8:15 11:18 18:15 19:10 21:4 22:12 24:14,16,17,19 30:13 32:2 33:24 41:17 42:1,3,12,15,18, 23 45:13 46:20 49:24 53:17 54:5 60:5,13 66:4 74:20 79:10 80:1 81:5,13,16 82:14,16, 18 83:8,15 91:23 92:9 106:8 109:24 110:3 111:2,6,7 119:20 121:3 133:17 135:23 136:15 139:17 140:1, 6,10 148:18 157:8,9 158:24 161:24 162:6 164:15 167:5 168:5 171:22 174:14 175:3, 6,12 177:7,15 179:5</p>	<p>184:21 185:5,8 191:18 192:9 195:8 196:12,22 197:4,9,12 198:15 202:21 203:2 204:14 207:6,10 212:18,19 220:13 222:2,14,16 223:10,15 224:2 227:14 228:7 230:10, 16 240:17,19 241:7,10 248:6,18 249:24 252:13,14,15 253:15</p> <p>questioning 23:23</p> <p>questions 8:5,17 9:2 18:7 19:13 21:10 42:19 49:7 60:21 64:21 73:15 78:23 79:4,6,12,14,22 80:2, 8,9,13 86:14,20 87:17 101:3 123:21 127:22 138:6,7,13 144:6 151:17 153:5 154:18 164:5 192:19 193:16 220:4 241:1 243:20 247:15 254:17,19</p> <p>quickly 87:21</p> <p>quote 81:8,12 82:15 120:12 196:22 197:1</p> <p>quoting 82:24 109:20</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>radar 26:24</p> <p>Raftelis 105:19</p> <p>raised 129:17 135:23 252:6</p> <p>raises 39:2</p> <p>raising 208:18 228:4</p> <p>ran 155:6</p> <p>range 17:1,2 34:21 38:3 128:5</p> <p>ranging 16:14</p> <p>rationale 102:3</p> <p>re-did 137:19</p> <p>re-read 136:14 148:16 162:5 167:2 179:4,7 196:17 202:23 221:14</p>
--	--	---	---

<p>re-reading 203:1 208:10</p> <p>re-reviewed 218:18</p> <p>reach 96:11 127:15</p> <p>reached 126:21 147:5 177:10 179:10</p> <p>reaching 62:16 78:16 126:18 160:20 233:13</p> <p>react 232:4</p> <p>reacting 247:4</p> <p>read 10:24 11:9,16,17, 24 12:16,19 17:23 19:8 28:10,20,22,23, 24 29:3,10,12 31:18, 21 38:12 40:13 42:5,7 43:2 49:5 53:10 54:3 56:10 76:10,14 81:20, 21 82:5,7 83:13,18 89:9,10 101:9 108:24 109:3,4 110:1 130:7 140:2,3 153:18 154:3, 4 157:10,11,17 162:6, 16 170:21 172:19 175:2,7 179:6,9 180:19 181:12 190:3, 12 193:22 199:14 201:18 204:13,15 209:2 210:1 218:20 221:13 222:11,18 230:16,23 232:20</p> <p>reader 211:22</p> <p>readily 29:13 144:8</p> <p>reading 31:14 32:1 79:12 81:9 83:20 89:7 120:6 134:16 135:19 142:19 180:16 181:6,8 201:14</p> <p>readopted 41:6</p> <p>real 18:15 84:18 87:21 128:23</p> <p>realigned 211:15</p> <p>reality 34:11</p> <p>realize 63:11</p> <p>reason 9:4 154:19</p> <p>reasons 43:24 45:8 46:9</p>	<p>rec 211:16</p> <p>recall 9:8 11:11,21,23 12:8 22:23 27:5 31:19 32:19 33:22 34:23 37:16 43:17 47:3,10, 12,21 48:17 51:12 53:5 54:17 55:16,18 57:17 62:12,13,19,21, 23 63:22 64:17,21 69:3 70:8 71:2,4 72:16,18 76:20,21 80:12 86:24 87:9 88:12,18 89:23 90:3,5, 14,18,20 91:11 93:16 95:20 96:5,20,21 101:16 102:2 103:12 107:23 109:4,6 111:23 113:15 116:7,11 121:6 122:5,10 125:12,13 126:16 132:10,13 134:1 135:4 136:6,8 137:1 141:2 142:21,22 144:1,19 152:23 153:3 154:18,20 159:19 160:19 162:8 165:8 167:5 168:13,14 172:22,23 173:6,10,16 174:15 176:14 178:7 184:20 185:13,15 186:11,15 187:18,19, 21,22 189:18,23 192:5,15,22,23 193:11 195:12 197:11,14,17, 18 198:20 199:16 202:2 204:11 205:2,5 207:3 208:9 213:18 231:2,17,19 232:23 233:4,6,18 234:7,18 235:15 236:4 237:16, 19 238:18,23 241:22, 24 243:13 244:4,6,9, 11,17 245:2,6,7 246:19 248:14,17,23 249:4 251:12,15 253:4 254:6,7</p> <p>recalling 87:7 129:4</p> <p>received 89:21 113:3 152:14 158:7 167:6 190:23 207:14 237:10 241:23</p> <p>receiving 76:20</p> <p>recent 153:11,23</p>	<p>recently 12:19,23 49:9 125:15</p> <p>recess 53:1 88:2 124:21 180:9</p> <p>reciting 226:20</p> <p>recognize 68:23 135:2,4 142:8 209:18</p> <p>recognizing 147:11</p> <p>recollection 30:1,2 32:20 57:3 64:2 88:20 90:9 91:12,24 92:7 94:2,20 104:18 127:7 183:4 189:20 190:1 199:15 207:12 208:14 213:14 237:23 240:5, 11</p> <p>recommend 16:18 148:15</p> <p>recommendation 12:12 35:4 62:14,16 66:7,9 67:12 164:13 212:11,14,18,23 213:1 222:24 229:16</p> <p>recommendations 16:2,3,11,13,16 18:2, 9,19 95:21 161:6,21 162:3 211:23 212:1 213:3,12,21</p> <p>recommended 34:13 54:1 148:12</p> <p>recommending 16:21</p> <p>reconciling 123:5 164:23</p> <p>reconsideration 12:22</p> <p>record 6:7 10:2 19:8 31:7 43:2 48:12 49:4 51:20 71:17 75:16 76:3 79:24 83:10 94:21 98:18 99:8 102:23 103:20 104:10 110:1 115:4 122:20 125:6 130:7 131:10 140:3 145:20 151:21 157:11 165:15 170:9 175:7 179:6,9 180:20 192:3 196:18 201:5 204:15 205:1 207:4,8</p>	<p>209:11 222:18 230:21, 22,23 241:6 248:2 250:4</p> <p>record's 42:20</p> <p>records 102:21 103:17,22 122:7 165:13</p> <p>recreation 60:18,23 61:2,6,10,13,16,24 62:4,6,20 63:5</p> <p>recreation's 61:14</p> <p>recurring 138:9</p> <p>redevelopment 33:14,16,19 34:12,15 69:22 80:7</p> <p>refamiliarize 101:1</p> <p>refer 6:13 26:9 46:19 123:3 190:2 218:16 221:12</p> <p>reference 38:22 56:14 57:13 84:1 97:23 156:14 221:21 222:4 227:15</p> <p>referenced 12:9 22:22 45:10 65:3 92:23 93:24 94:8,16 98:16 99:11 111:18 157:2 170:17 203:24 230:2</p> <p>references 55:14</p> <p>referencing 99:4 109:11 136:10 148:1 183:11,16</p> <p>referred 6:15 29:17 38:2 122:15 200:4</p> <p>referring 6:17 24:13 26:16 29:18 36:18 38:4 57:6 64:9 65:19 76:23,24 80:16,24 84:7 92:3 95:14 111:22 116:2,4,5,7 121:19 127:1 136:11 148:2 156:5,15 159:4 162:1 208:17,18 217:19 218:9 220:10 221:5 226:4 227:19 239:6</p> <p>refers 81:1 199:10</p>
--	---	--	--

<p>refined 164:14</p> <p>reflect 43:24 85:6 103:23 131:17 133:4 141:5 215:9</p> <p>reflected 85:20 112:3 113:21 132:6 141:9 159:8 219:2</p> <p>reflecting 45:24 204:10</p> <p>reflection 110:5,7</p> <p>reflects 57:16 102:13 112:19 135:5,10 183:2</p> <p>refrain 8:5 42:10</p> <p>refresh 32:20 157:24 240:5,11</p> <p>regard 18:1 25:15,17, 18 223:16</p> <p>region 37:23</p> <p>regularly 70:2 232:4 233:10</p> <p>related 16:3 22:2 50:4 61:12 64:16 91:21 99:15 110:8 128:2 135:8 149:23 155:3 219:24 222:7 228:7 246:10</p> <p>relates 199:7</p> <p>relations 107:16</p> <p>relationship 72:6 74:5 93:17</p> <p>relationships 95:4 102:4 158:13 211:16</p> <p>release 55:1,6,13,16</p> <p>released 188:22</p> <p>relevance 25:11 26:1 43:22 54:14 55:17 58:18 67:16 131:7 220:14 235:6</p> <p>relied 105:9 175:21</p> <p>rely 122:3 174:7</p> <p>relying 104:9 210:7</p> <p>remember 11:13 30:16 32:7 33:1 36:14 39:17 47:17 48:3,4</p>	<p>52:16 53:24 55:7 78:5 90:4 96:7,16 112:4,17, 20 113:15 115:14 121:11 123:18 126:22 127:5,24 128:16 129:1 131:22 132:3 137:16 145:1 152:11 156:8 158:9,10,11 159:20 160:19 166:24 168:15, 17,24 169:7,9,10 173:24 184:18 186:13 192:9 194:20 197:10 200:13 207:23 213:7 232:21 236:13 238:4 244:13 245:24 247:7, 13,14 248:23 249:5,8, 21,22 251:1 253:1 254:10</p> <p>remembering 125:23</p> <p>reminding 240:21</p> <p>rent 224:5 225:19 226:19,23,24 227:4</p> <p>rental 226:13,14</p> <p>reorganization 211:14</p> <p>repair 72:14 74:23</p> <p>repairing 74:17</p> <p>repeat 7:10 19:6,7 83:15 130:6 140:1 175:6 222:2 235:21 252:13,14</p> <p>repeated 227:15</p> <p>repetitively 224:8</p> <p>rephrase 7:11 196:17 252:15</p> <p>reply 187:24 188:9</p> <p>report 11:18 102:13 146:21 148:16 161:8, 11 162:1,3,11,21 164:11 176:12 177:6 214:3 220:17 233:17</p> <p>reported 17:7,8,14,15 32:10 211:12,17 233:16</p> <p>reporter 7:15 8:2 75:10 97:10</p> <p>reporters 145:15</p>	<p>reporting 211:15</p> <p>reports 16:8 32:13 119:5 146:17,23 163:4</p> <p>represent 68:17</p> <p>representatives 43:6 77:4 87:13 158:21 234:5,9 239:4</p> <p>reputable 25:14</p> <p>request 171:14 184:3, 4 199:2 235:14 237:3, 7,10</p> <p>requested 19:8 43:2 79:18,19 110:1 130:7 140:3 142:17 157:11 175:7 179:6,9 204:15 222:18 230:23 235:8</p> <p>requests 236:23</p> <p>require 93:3 105:8 175:18 178:3</p> <p>required 13:11 20:6 73:13 93:1,22 94:1,5 117:11</p> <p>requirements 90:12 108:17</p> <p>requires 250:5</p> <p>research 74:2 130:15</p> <p>researched 38:12</p> <p>reserve 164:6 216:16</p> <p>reshape 246:9</p> <p>resident 62:1</p> <p>residential 118:9,18 120:21 176:6 218:1 225:4,19 227:24</p> <p>residents 21:14 79:17 119:14 176:11 224:14 225:8,12 227:16</p> <p>resolution 147:1 159:11 243:16,21,24 244:4,8,11,19,23 245:3</p> <p>resolutions 244:15</p> <p>resolve 147:20,22</p> <p>resource 13:13</p>	<p>resources 63:12 105:16</p> <p>respect 16:11 17:4,16 21:21,24 38:1 39:5 55:4 59:5,9 60:21 72:19,20 74:3 93:8 104:24 106:4 108:18 110:20 116:1 118:6 120:15 127:10 160:7 165:11 174:6 177:8 183:9 188:12 189:16 207:14 212:20 216:22 217:2,14,18 221:2 225:18 227:16 228:14 229:24 237:4 244:21 246:2 247:15 250:23</p> <p>respecting 67:10</p> <p>respond 37:12 79:21 86:20 197:3 202:20 218:6</p> <p>responded 209:3</p> <p>responding 79:23 120:2,4 195:1</p> <p>responds 224:2</p> <p>response 46:20 80:12 118:23 140:20 144:13 155:16 184:22 196:2 198:23 202:12 204:20 206:8 207:17 226:19</p> <p>responses 8:4 151:17</p> <p>responsibilities 15:19 16:17 17:4 18:23</p> <p>responsibility 17:22 18:13</p> <p>responsible 15:22 16:13 17:10,18 19:1 20:2 56:17</p> <p>responsive 229:23</p> <p>rested 137:20</p> <p>restoration 74:24</p> <p>restore 72:15 74:7</p> <p>result 66:21 95:10 148:22 239:19</p> <p>resulted 250:9 254:2</p> <p>retail 41:9 43:11 44:23 45:2 46:12</p>
---	--	--	--

<p>retain 33:4 49:18</p> <p>retained 34:24 52:6</p> <p>retiring 25:16</p> <p>retreat 101:17 102:7 103:18 105:5 106:1,7 107:13,21 108:18,20 109:5,6 110:12,21 116:10 123:12 142:7 143:24 146:10 171:15 183:21 184:2,5,14,18 185:1,11</p> <p>retreats 14:16 101:12, 22 102:1,18 103:2 104:6,14,24 106:5 108:3 146:8</p> <p>revenue 44:11 45:7 114:10,12 115:7,23 116:21 117:8,16,18 118:19</p> <p>revenue-producing 117:5 119:18</p> <p>revenues 178:15</p> <p>review 12:3 18:4 19:4 20:10,24 29:9 40:14, 16 45:18,23 46:23 47:8 48:19,23 54:7,17 79:24 80:11 83:17 92:12 101:8 134:19 137:3 141:13 176:18, 19 181:16 185:21 195:17 217:9 227:12 243:17 247:9</p> <p>reviewed 11:12,20,22 31:15 53:20 54:12,16 55:5 66:13,17 89:21 152:2,16 172:24 191:20 196:8 209:21 211:4,18 213:3 218:18 219:1 231:15 234:16 245:6</p> <p>reviewing 20:6 29:6 53:4 55:8 67:19 74:6 141:3 176:12 209:10 252:2</p> <p>reviews 19:22</p> <p>revise 54:7 152:21</p> <p>revised 179:13</p> <p>revision 248:7</p>	<p>revisions 113:13,24 179:16 210:3,4 247:11</p> <p>rezone 70:22</p> <p>rezoning 12:11 20:21 22:17 24:9 27:9 49:12, 19 93:1,3,9,23 94:1,5 98:22 99:3 179:20 206:13,20</p> <p>rezonings 17:4,16,18, 20 18:10 19:19 20:1 21:24 23:24</p> <p>Rhonda 109:24</p> <p>right-hand 53:16 151:10</p> <p>riparian 72:15 74:7</p> <p>rise 215:20</p> <p>River 250:7,8,10</p> <p>Road 50:17 250:7,9,10</p> <p>Robinson 76:17 77:5, 8,9 78:3,9,20 81:1 84:13,16,22 85:3 126:15,18 127:1,6 131:12 132:12 142:12, 17 143:23 144:11 151:18 152:20 165:20 167:7,10 168:11 169:3 171:16 180:23 181:18, 24 183:17,20 184:23 186:20 187:2,11 192:13 195:22 196:3, 21 197:8 198:23 201:1,11 202:6 204:9 206:8,21 207:15 208:18 235:12,13 236:15 242:9,11 245:18,23 246:3,24 247:23 248:11,20 249:1,10,14 253:22</p> <p>Robinson's 84:2 142:14 144:13 181:16 184:3 185:13 186:14 187:23 188:13 189:17 196:6 197:4 202:21 204:22 208:3 237:3 254:11</p> <p>robust 64:15 131:1</p> <p>Robyn 100:17 172:8</p> <p>role 18:3 19:16,17 22:18 25:10 39:5,13,</p>	<p>14,15 67:5,12 78:9,13 117:22 130:15 138:1 148:5 176:18 203:7 210:5,6 223:2,3,8 229:10</p> <p>roles 37:6 67:10 166:7</p> <p>room 111:24 112:22 169:3</p> <p>rooted 106:15</p> <p>rough 176:24</p> <p>roughly 160:4 252:10</p> <p>round 214:1</p> <p>rule 118:21,23 120:6 253:8</p> <p>rules 7:4 120:2 122:22 123:13,17</p> <p>run 25:20 128:14 173:18 177:19</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>safety 10:12,13</p> <p>sale 32:19 33:9 225:18 226:18</p> <p>sat 29:24</p> <p>satisfy 84:11</p> <p>Saturday 103:10</p> <p>scale 139:14</p> <p>scenario 120:21 121:24 174:1</p> <p>scenarios 110:18 115:17 116:2,4,14,19 117:21 120:11,13 121:15 122:5 143:9 144:9 163:2 170:19 171:1,3,4,10,14 173:2, 9,15,19 176:17</p> <p>schedule 171:8 218:17</p> <p>school 108:13 178:5</p> <p>Schumacher 8:16 10:15 17:19 19:5,9,14 21:2 23:17,21 24:12, 18,20,23 25:1,11 26:1 31:1,17 35:6 41:22,24</p>	<p>42:4,11,16 43:1,3,22 48:22 49:3 52:19 54:14 55:17 58:18,24 59:17 60:13 64:11 65:10,13,17,21 67:16 74:9 75:8,11,12,16,17 76:9 79:9 81:4,7,11, 18,23 82:2,10,12 83:2, 9,22 84:9,23 87:10,12 88:10 91:1 94:11,14 97:9,11 98:4 104:15 109:13,18,22 110:2,24 111:5 112:10 113:9 118:11,15 123:14,22 124:8 126:1,5,7 127:17,20,23 130:1,4 131:7 132:14 133:10, 16 134:5,16 140:7 145:9,15 150:4,23 151:12 153:18 157:7 162:16 168:1,4 169:5, 22 177:13,18 178:17, 21 179:1 180:4,15 181:10 182:24 185:7 187:15 188:16 190:10 191:14 192:7 194:21 196:15,18 198:3,15,17 200:7 201:8,14,19 202:4,22 204:13,16 208:6 209:8 212:2,4 214:17 216:11 217:4 219:13 220:8,10 221:7,10 222:1,8,13, 16,19 223:23 225:13, 23 226:3 227:7 228:3, 6,10 229:6,9 230:13, 20 232:14,18 233:2 235:6 238:8 239:11, 19,23 240:1,3,8,16,23 241:4,8 242:14 245:10 250:1 252:5,7,22 253:1,6,12,15,19</p> <p>science 15:7</p> <p>scope 165:2</p> <p>Scott 76:1</p> <p>scripture 221:19</p> <p>second-to-last 153:9,10,16</p> <p>section 141:10 179:8 202:15 214:22 218:3, 14 225:3</p> <p>sections 221:14,19</p>
--	---	---	--

seek 69:12 73:11 206:22	175:13,16 178:6 211:16	15,16 101:2 119:4 139:13 194:3	skimmed 101:9 108:23
seeking 29:2 41:8 58:19 89:24 119:15 131:4 152:21 165:11 171:23	services 34:8 45:7 52:10,17 116:23 117:8,10,19 119:13,18 172:11 175:15,19,24 177:2,20 178:2	significantly 219:5	slogan 77:20
seemingly 215:6	serving 115:12	Silk 10:16 24:24 168:3 179:3 241:7	small 14:4
sees 81:5,13 82:13,15, 19,22	session 125:2 129:18	similar 38:17 71:1 119:6 120:6 179:19 243:20 247:15 248:18	smaller 92:17 95:6,10 139:17
select 29:8	set 34:21 106:9 110:10 114:20 122:22 165:18 172:7 177:9 179:12 184:7 185:11 188:14 203:10 207:15 211:23 213:12 216:23 217:17 220:1 248:22	simple 136:1 196:11, 22	Smith 131:21 132:12 197:23 198:12 199:2 200:4 205:2 206:21
selected 61:19	setting 46:14 102:8	simply 53:18 54:5 195:8	snowing 28:2
selects 106:6	seven-member 25:6	sincere 160:24	social 30:8 33:8 35:15 37:17,20
sell 27:14 32:22 33:2	sewer 115:19	single 23:4	sold 35:18
send 212:16 246:14	shaking 8:3	single-level 224:6,20 227:10,20	sole 35:8 59:23
sending 72:1 91:11, 13	shape 148:6 246:13	single-story 227:24	solely 50:4
Senior 108:14	share 152:8 160:14 193:13 207:22 210:23 216:16 217:10 241:19 242:19 243:6 247:16 249:1	singled 29:10	solicit 59:11 167:15
sense 8:7 16:1 20:18 75:7 113:2 137:4 177:2 231:22	shared 107:19 131:11 141:9 157:20 158:2,3 160:16,18 163:12 213:8 241:11 242:5,13 249:10,15	sir 42:24 195:19 221:1 227:18	solicited 167:17
sensing 149:16	sharing 157:16 241:15 243:11	sit 81:19 82:4 95:5	solil 179:2
sensitive 35:10 36:3 46:1,10,14 50:6 70:10 85:24 147:12 150:13 193:4 210:21	Shops 50:20	site 30:15 33:16,19 34:12 37:11,24 44:24 46:1,9 49:9,15,21 50:8,20 58:13 59:13 63:4 64:7 70:16 75:6 85:24 91:20 92:14,15 93:13,20 94:17 108:20 109:1,12,15 110:9,14, 22 112:14 113:7 114:9 115:9 116:10 117:4,21 118:9 119:17 120:16, 18 122:1 131:6 133:22 143:9 148:3 149:3 184:1 191:9 193:7,10, 20 215:5 223:12 224:4 238:7	soliloquy 24:23,24 25:1 179:3
sensitivity 114:22	short 13:8 150:20,23 225:20	sites 36:3 70:10 119:11 193:15	sore 252:8
sentence 33:18 34:10 82:20,21 153:21 156:24 170:23 197:22 198:4 200:6	show 97:22 119:5	situation 147:16,18, 22 148:2 164:12	sought 27:13
sentiment 205:24	shows 149:23	sizes 195:5	sound 181:21
September 55:13 56:4 57:7 66:1,6 183:24 186:22 190:19 195:24 199:1	sides 46:3	skill 34:21	sounded 109:22
sequence 240:12,21 254:10	signature 52:2 77:12 152:4 170:12	skilled 147:16	sounds 230:6
sequencing 144:2	signatures 77:24	skim 100:24	source 35:11
serve 115:18 116:22 117:6 143:2,14 144:9, 20 175:20	signed 53:24 54:13 172:14 202:1		space 29:24 30:5,9 34:3 44:12 62:9 63:5 64:5,22 68:3,20 72:14 73:7 74:7,15 79:7,15 80:10,17 81:1 84:2,7 85:15,16 110:16 115:7 135:24 214:15 219:7 230:3,4
serves 98:20	significant 18:1 85:4,		speak 42:21 67:18 103:24 129:11,13 165:13 237:12
service 30:9 33:8 35:15 37:17,20 115:24			speaking 15:17 83:4 132:19 178:24
			special 48:13 49:18 50:4
			specialized 50:18

<p>specialty 47:19</p> <p>specific 12:8 21:3 27:5 30:2,17 43:17 48:4 64:2 67:18 69:14 70:19 76:22 80:13 87:7 88:20 90:4 91:12, 24 92:7 95:21 96:22 102:2 104:18 107:14 109:7 115:15 119:24 126:16 128:18 129:11 132:4 133:6,19,20,23 142:22 144:1,6 152:13 154:20 156:6,22 168:13 173:17 174:18 177:8 183:5 186:15 187:16 199:14 210:14 211:1,5 213:14 221:14 228:12,17 234:7 235:15 237:19 242:5, 18 246:4 247:7 248:7, 15 249:19</p> <p>specifically 19:18 31:19 39:17 51:12 55:7 57:17 64:17 69:19 80:1 88:12 90:18,20 93:16 96:7 102:7 103:12 107:22 111:24 116:6 120:12 121:6 122:10 125:24 128:16 137:1 141:3 144:19 145:1 154:13, 19 159:6,20 160:18 168:14 173:10,16,24 184:19 192:22 218:11 231:3 233:18 234:10 237:16 241:22 244:10, 17</p> <p>specifics 109:8 158:8 176:15 198:20</p> <p>speculating 233:12</p> <p>spend 67:15 102:8 171:6,9</p> <p>spending 167:8 195:2</p> <p>split 90:1,16 95:5</p> <p>spoke 237:8,24</p> <p>spot 108:4 180:2</p> <p>square 97:24 98:18</p> <p>staff 11:17 16:2,5,7 19:16,18 21:9,10,23 22:18 28:15 34:17</p>	<p>61:17 66:21 72:23 75:4 92:11,23 95:16 102:15 103:3,6 107:11 118:1 122:1 128:16 129:2,5 137:3 143:15 144:4,21 146:14 152:12 153:12,23 154:10 155:20 156:5, 14,15,19 157:21 158:6,24 172:10 173:4,11,13 175:19,22 176:2 184:13 189:5 197:24 198:13 203:19 209:13 212:6,9,11,20 213:1,21 214:3 220:17 221:12,15 226:9 227:23 228:7,9,21 229:13 230:14 238:14, 16 243:9,10 244:16 246:17 247:3,10 248:21</p> <p>staff's 19:16,17 21:24 117:22 212:14 215:14 216:3 217:8 219:2</p> <p>stage 163:13</p> <p>stakeholders 147:21</p> <p>stamped 134:22 170:10 201:6</p> <p>stand 198:5 216:10</p> <p>stand-alone 92:17</p> <p>standard 69:21</p> <p>stark 28:1</p> <p>start 7:21 28:23 38:11 82:1 94:12 136:19 181:3</p> <p>started 35:2 50:19</p> <p>starting 53:15 87:17 115:13,16 117:20 136:22 162:1</p> <p>starts 32:15</p> <p>state 6:6 105:15</p> <p>Statehouse 46:7</p> <p>statement 61:4 156:3 185:7</p> <p>statements 82:5</p> <p>stating 36:7 226:24 235:11</p>	<p>station 41:10</p> <p>status 151:18</p> <p>stay 224:18</p> <p>staying 114:8 124:13, 15</p> <p>Steiner 153:13,24 154:8,12 158:4</p> <p>steps 106:20</p> <p>Steward 152:13 174:19</p> <p>stewardship 44:18</p> <p>Stewart 17:8,15 100:17 172:8 175:11 176:16 211:12 213:11 238:22</p> <p>Stewart's 211:24</p> <p>stimulated 250:12</p> <p>stop 7:8 83:3 145:16 212:4,5</p> <p>store 41:9</p> <p>straightforward 81:17</p> <p>strategic 14:13 85:7 102:11 129:16 131:14, 17 132:6 138:10,11 147:2,10 148:6 149:11,19 150:14 203:12,24 205:7 224:9 246:9</p> <p>strategically 45:3</p> <p>strategies 80:20 85:19 135:24</p> <p>strategy 129:22 130:23</p> <p>stream 117:16,18</p> <p>street 24:4 26:12,13 36:2 58:5 92:22 93:10 95:9 98:1,15 110:15 117:13 149:8 150:10 151:2 239:13</p> <p>strike 45:4 53:22 54:7 94:12 119:16 217:16 218:12</p> <p>strike-throughs 54:3</p>	<p>striking 54:2</p> <p>strip 46:6</p> <p>strong 131:19</p> <p>strongly 86:3 131:15 147:14 149:10 155:7 203:12</p> <p>struck 214:11</p> <p>structure 117:10</p> <p>structured 165:24</p> <p>structures 176:7</p> <p>struggling 171:8</p> <p>stuck 19:11</p> <p>studies 14:15 120:7 178:4,5,6</p> <p>study 79:18</p> <p>stuff 74:1 146:14,16 169:18</p> <p>styles 225:19</p> <p>subdivide 99:16</p> <p>subdivided 92:20 100:8</p> <p>subdivision 93:2 98:21 100:1 139:17 215:8</p> <p>subject 22:7 27:16 72:2 89:16 91:7 94:20 97:19 142:6 146:13 151:16 152:19 158:16 170:5 186:5 190:20 192:24 196:3 201:2</p> <p>subjectively 33:23</p> <p>submittal 221:17,20</p> <p>submitted 70:21 162:11 206:19</p> <p>subsequent 176:10</p> <p>subsequently 254:8</p> <p>substance 11:4 209:8 210:11</p> <p>substantial 100:22</p> <p>substantive 159:24 193:12,19 194:5 199:24 254:2</p>
---	--	---	--

<p>substantively 210:9 247:9</p> <p>successful 59:2 74:13,16 155:18</p> <p>successor 57:23</p> <p>sudden 187:7,12</p> <p>sufficient 117:5 219:6,7</p> <p>suggested 113:16 194:7 223:18</p> <p>suggesting 87:18</p> <p>sum 67:22</p> <p>summaries 106:1 193:9</p> <p>summarized 98:11 112:5 192:1</p> <p>summarizes 112:11</p> <p>summarizing 111:4 112:7,8 114:12</p> <p>summary 102:23 105:4,10 108:19 110:8,11 113:5 166:16,22 168:11 169:4 190:24 193:1, 22,23 194:13 196:8</p> <p>sums 52:13</p> <p>sun 87:15</p> <p>super 250:5</p> <p>supplement 189:15</p> <p>supplies 175:19</p> <p>support 23:8 43:15, 19,21 156:13 217:12</p> <p>supported 34:6 95:12,18 219:9</p> <p>supportive 93:5</p> <p>supports 119:12</p> <p>surprising 67:7</p> <p>surrounded 46:2 150:9</p> <p>suspect 141:14</p> <p>suspend 186:6 187:4, 12</p>	<p>suspension 208:17</p> <p>sustainability 107:17</p> <p>sustenance 124:17</p> <p>swore 9:18</p> <p>sworn 6:2 182:8</p> <p>system 61:13 67:6</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>takes 130:9</p> <p>taking 20:2 174:12</p> <p>talk 7:17 9:24 11:2 102:10 107:16,17 114:17 186:10 187:11 194:11 220:18 238:16</p> <p>talked 107:1 124:7 125:9 127:6 131:24 137:23,24 140:23 143:1 158:18 159:5 211:3 213:5 238:19,20</p> <p>talking 19:14,18 20:21 21:2 26:11,20 28:17 42:8,10 73:23 82:1 86:7 89:17 97:11 98:2 115:21 125:11 126:2 128:22 132:14 156:18 160:21 176:5,13 177:16 208:21,23 252:4,10</p> <p>talks 32:18 218:3</p> <p>tax 33:15 44:10 115:6, 22 117:10</p> <p>taxes 44:10 119:8</p> <p>teacher 26:5</p> <p>team 111:21</p> <p>teams 112:9</p> <p>technical 21:12 94:3 210:8 223:4</p> <p>technically 16:8</p> <p>tem 144:16,24</p> <p>temporarily 186:6 187:4,12</p> <p>temporary 208:17</p> <p>tend 118:19</p>	<p>tension 149:20 150:16,21</p> <p>tenure 17:13 27:7 104:16 235:16</p> <p>term 17:19 50:6 114:19 127:14</p> <p>terms 18:1 53:8,12 84:2 96:12 128:6 149:21 203:6 205:24</p> <p>testified 204:8 243:2 254:3</p> <p>testifying 9:21 118:7</p> <p>testimony 9:6 74:10 118:22 217:15 254:22</p> <p>text 216:8</p> <p>theme 155:6</p> <p>themes 106:16 107:15</p> <p>thick 148:18</p> <p>thing 65:10 91:14 92:18 113:18 153:19 192:2 197:19 206:6 214:2 224:1</p> <p>things 9:8 19:24 23:7 34:21 37:18 41:3 44:5, 13 69:12 70:18 91:16 99:2 102:16 103:18 106:18 111:15 114:17 115:2 116:12 117:14 119:17 121:10 128:15 129:3,18,24 130:21 135:18 138:8,20 155:12 158:10,22 163:10 165:16 187:1 193:12 194:23 199:7 202:13 205:12 215:24 219:10,21 220:6 224:8</p> <p>thinking 47:16,24 115:22 125:18 157:15 163:13 213:6</p> <p>thought 44:1,5 46:19 49:1 50:22 76:13 83:12 85:12,21 95:16, 17 123:22 129:14 130:20 131:13 132:5 135:18 141:11 144:6 147:19 153:6 156:1 199:22 201:18 205:17 213:22 214:1 215:16, 17 219:1 226:3 228:4</p>	<p>231:7 233:8 240:23</p> <p>thoughts 39:12 133:5 135:22 205:4 210:23 216:22 217:11 229:12, 13,15</p> <p>thumb 118:21,24 120:3,6</p> <p>Thursday 188:23 189:2,15</p> <p>till 124:13,15</p> <p>time 8:11 10:10 13:8 25:17 27:4,13 28:9 30:5,7,11 31:23 32:9, 11,20 33:7 34:16 36:21 37:3 38:6,18 44:19 47:3,7 49:11 52:19 57:3,6 59:1 61:24 63:21 64:4,9,14 65:1 69:1 70:17,23 71:20,22 76:6 77:2,23 78:3,21 81:22 83:14 84:11,15 85:1 86:5,6, 9,19,24 87:3 88:13 93:19 98:10 101:4 102:8,17 104:5,6,20 105:12,14 112:1 122:7 123:12 125:11,18,23 127:12,13,18,21 128:8 129:4,9,11,13 130:21 131:2 132:13,18 133:2 139:13 143:15 144:15, 22 160:6 164:2,17 166:1 167:3,9 171:7,9 172:9 175:4 180:6 182:4 183:15 184:23 194:24 195:2,6 199:20 200:14 205:14 206:16 211:1 218:8,17 219:1, 3 220:21 222:12 224:22 228:20 232:11 233:9 235:15 236:15 237:1 239:9,14 249:6, 18 251:7,19 252:16,21 254:13</p> <p>timeline 114:14 206:18 237:19</p> <p>timelines 115:15</p> <p>timely 232:7</p> <p>times 17:7 38:15,19 43:7 73:4 103:4,8 114:16 194:1 234:7</p>
---	---	--	--

timing 68:20 84:24 116:11 142:24 title 32:4 245:14 titled 10:12 162:22 today 6:13 7:4 8:2,22 9:2,6,15 10:16,23 11:6 24:4 26:9 27:10 83:19 100:9,10 124:7,9,13 143:6 202:2 231:15 240:9 254:13,19 today's 9:19 11:7 Todd 166:18 told 129:23 134:5 135:16 184:24 200:7 220:18 248:16 253:20 Tom 191:2 tomorrow 187:3 ton 132:21 135:17 tool 69:11 70:12 top 186:24 topic 111:13 182:17 183:9,20 184:24 185:3 193:5 topics 107:18 154:21 totality 132:19 totally 229:23 touched 246:21 town 149:6 traffic 143:13 train 145:17 transaction 33:9 transcribe 8:2 transcript 7:16 8:1 transition 36:10 126:23 transmit 176:20 transmits 212:13 transmitted 66:16 114:4 173:1 245:20 transparent 192:17 transpired 184:19	199:13 trash 115:20 117:11 treat 23:5 143:5 tree 110:16 triggered 94:6 troubled 49:10 true 83:2 143:7 173:7 trust 231:8 truth 9:19 30:16 Tucker 73:3 74:19,23 110:16 Tuesday 237:21 turn 52:1 53:17 80:22 136:9 142:14 163:23 turning 76:16 162:10 turnover 37:6 type 14:12 16:12 34:14 44:20 91:14 99:5 117:7 128:15 223:11 224:23 227:3 types 171:21 175:20 214:13 217:18 218:2, 10 221:3,22 222:5 224:14 227:5 230:2 typically 108:4 typo 160:10 <hr/> <p style="text-align: center;">U</p> <hr/> uh-huh 12:23 48:20 49:2 57:14 71:14 72:7 uh-huhs 8:5 ultimate 18:12,17 ultimately 17:7,21 18:8 19:3 20:1,9 45:17 49:18 50:24 90:16 99:17 100:7 143:18 148:9 172:14 210:18 215:3 223:1,7 UMC 182:18 183:10 UMCH 26:10,18,23 27:3,13 28:7,11,12,15 29:23 30:14 32:18,21 35:14 36:1 41:10 49:9,	15,21 50:4,5,13 54:24 56:20 57:10 58:13 62:8 63:18 67:15 68:12 69:4 72:6,19 73:2 74:5 77:6 78:18 79:8 80:10 85:17 86:8 87:14 88:8 89:16 91:8, 20 92:20 93:12,13,20 94:9,17 95:4 97:19 99:17 108:20 109:1 113:6 114:9,22 116:9 118:9 120:12,15 125:10,17 127:11 129:9 131:5 133:21 135:8 138:12 139:1, 19,24 140:16,24 142:7 146:13 148:3 149:3,5 150:1 151:18 157:4 158:1,12 159:14 161:7 163:2 165:12 166:17, 22 170:7 173:14 184:1 185:10 186:5 187:4,13 190:20 191:9 192:24 193:10,20 196:3 198:9,10 201:3 202:8 207:19 208:22 214:23 221:19 224:10 229:11 234:21 237:4 238:7 239:21 241:12 246:10 248:1 251:22 252:20 UMCH's 33:7 35:22 36:15,22 UMCH-RELATED 196:13,23 unanimity 205:6 uncharacteristic 156:3 uncharacteristically 155:23 underrepresented 224:15 225:5 understand 6:17 7:6 8:18,19 9:1,20 18:14 19:9 21:4 26:15 33:21 42:3 45:15 58:19 59:12,22 74:22 83:7 112:6 119:23 121:3 130:2 157:8 163:22,24 172:1 178:11,20 219:12,15 222:3 230:9 239:10 249:9	understanding 38:21 51:2 84:21 93:15 96:10 101:11 165:10 216:21 219:18 understood 7:12 113:23 174:22 189:1 undeveloped 149:8 unfairly 231:6 unit 24:7 51:4 United 99:22 112:14 units 120:18 223:12 unsuccessful 83:14 unusual 193:14 update 34:24 41:5 43:12 51:11 52:15 55:15 58:11 59:5,9 66:1,5,10,15 97:19 151:19 179:16 186:6 187:5 201:3 202:8 203:4 207:19 208:12, 23 214:12 244:22 245:1,11 updated 179:13 205:22 214:23 234:8 updates 232:6 233:14 updating 48:2 205:21 252:2 upfront 67:23 urgency 187:8 urges 62:6 utility 75:5 utilize 93:9 104:13 utilized 34:15 104:6 utilizing 177:3 utterly 150:15 <hr/> <p style="text-align: center;">V</p> <hr/> vacant 29:24 30:8 32:21 93:19 250:11 vacated 49:9 valuable 37:22 valuation 176:8
--	---	---	---

<p>varied 103:11</p> <p>variety 13:3 43:23 102:16 206:3 218:6</p> <p>verbal 8:4</p> <p>verbally 233:19</p> <p>verify 121:1</p> <p>verse 221:19</p> <p>version 137:13 164:14 190:9 191:15, 16 214:3,4 218:16</p> <p>versus 119:18</p> <p>viability 34:11</p> <p>viable 37:21</p> <p>video 192:3,11 205:9</p> <p>view 194:18 204:23</p> <p>viewed 36:2,3 70:14 139:8</p> <p>viewpoints 216:4</p> <p>views 112:7,8,19,21 155:7</p> <p>village 50:9 150:19</p> <p>virtual 194:22 233:2</p> <p>virtually 233:5</p> <p>vision 59:3 148:21</p> <p>visioning 54:24 147:2 148:11,15,23 149:1 157:3 160:13 161:23 162:23</p> <p>visions 149:17</p> <p>Visitors 57:20</p> <p>vitality 17:1 58:6</p> <p>vivid 242:3</p> <p>vociferous 155:16</p> <p>voice 131:12 182:11</p> <p>voiced 37:14</p> <p>volume 37:10 80:2 211:20 214:22</p> <p>Volusia 13:4,6,14,18 14:2</p> <p>vote 189:24</p>	<p>voted 122:21 235:18 239:17</p> <p>voter 78:1</p> <p>voters 84:15</p> <p>voting 95:24 237:8</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>W-A-R-D 56:14</p> <p>wait 42:22 65:11</p> <p>walk 7:3</p> <p>wanted 42:11 44:1 59:4 65:23 74:21 84:22 111:6 113:20 122:11 125:8 143:17 147:15 171:10 173:20</p> <p>WARD 56:14,15,16,23 57:2,11 77:4 79:1 85:11 174:3,7,18,19</p> <p>WARD's 174:6</p> <p>waste 81:21</p> <p>watch 192:4 205:9</p> <p>water 115:18 230:19</p> <p>Waterline 117:12</p> <p>ways 37:15 67:6 73:8 115:19 224:21</p> <p>website 189:5 214:22</p> <p>websites 165:16</p> <p>WEC 87:3,8 88:16 108:6 120:23</p> <p>week 188:19 236:1,21, 22 237:17 238:1</p> <p>weekend 107:1 237:17 238:1</p> <p>weighing 67:1</p> <p>weight 66:20 200:15</p> <p>West 92:19 94:23 95:2 98:6 99:13,22 100:6 215:9</p> <p>wheeled 145:9</p> <p>white 174:2,6,12</p> <p>wholly 44:3</p>	<p>Why's 144:14 199:5</p> <p>wide 16:14 17:2 34:20</p> <p>Wilson 50:17</p> <p>withdrawal 91:8 96:6</p> <p>withdrawn 95:24</p> <p>withdrew 96:4</p> <p>wonderful 26:6</p> <p>wondering 87:17 140:12</p> <p>word 19:11 122:20 150:6</p> <p>words 50:7 100:8 110:23 113:5 122:23 134:2 140:15 191:23 200:2 203:2,3</p> <p>work 13:12 14:16,23 17:11 21:16 35:1 51:9 55:15 57:11 84:18 85:5 102:6,11,12,15 112:12,23 119:9 122:24 128:22,24 137:3 143:11,15,17 147:23 157:22 169:23 171:8 176:20 178:10 203:7 210:19 250:13</p> <p>worked 14:4 33:3 44:16 46:4 85:13 92:24 93:5 94:7 105:14 250:18 252:11</p> <p>workers 44:10</p> <p>working 102:17 107:10 137:16 153:12, 24 154:11 166:4 170:6 237:11</p> <p>works 21:1</p> <p>workshop 111:19</p> <p>world 63:3 65:3</p> <p>worried 115:11</p> <p>Worthington 9:9 13:2 15:18 25:4,9 27:20,22 28:4 29:7 30:18 31:8 33:13 34:18 36:6 40:1, 2 44:14,15,24 45:12, 16,19 48:14 50:21 51:22 54:24 55:2 56:5, 17 57:23 58:1,2,3,7,8 61:5,6,9 67:9 68:14</p>	<p>71:19 77:10,13,16,18 78:10 84:15 85:11 97:6,15,16 100:19 108:8 119:3,6 134:22 138:9 142:2 146:3 148:22 149:1 150:12 162:24 170:10 176:1 190:18 195:4,23 201:6 209:15 225:7,12 227:21 251:20</p> <p>Worthington's 10:17 24:5 150:17 224:16 225:6</p> <p>Worthington.org. 71:21</p> <p>wrestle 115:14,17</p> <p>wrestling 128:24 143:10,14 205:12</p> <p>Wright 105:15</p> <p>write 60:11 153:11 188:18 213:9</p> <p>writer 211:22</p> <p>writes 175:11 212:15</p> <p>writing 41:19 48:4,5 114:2 141:11 202:7</p> <p>written 8:1 21:22 23:1,3 38:10 43:19 51:5,6 63:9,16 104:10 105:4 107:19 189:4,14 193:22 198:22 201:12 217:12 226:18 229:14</p> <p>wrong 23:15 190:9 203:14 235:1</p> <p>wrote 33:11 47:22,23 58:10 80:12 117:21 135:5 136:13,17 152:18 153:1,22 170:22 173:5 174:4,9, 12 183:8 197:23 202:13 211:20 215:23 219:20,23 234:23 246:6,10</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>Yaromir 154:8,12 158:4,7,8,15,18 160:3, 23 194:6</p>
--	--	--	---

year 14:5 30:3,17 35:2
38:3 87:4 102:5 108:5
146:11 154:23 246:7

years 10:3 13:19,23
15:17 17:15 30:14
108:7 137:19 142:24
153:12,23 183:5 194:2
215:3 223:19 227:21
248:3

yesterday 65:14,20
124:8

yielding 155:19

York 145:13

young 225:8

Z

zap 34:7

zoning 12:4 13:5 23:4
50:23 67:5 78:1 91:9,
19 95:18 99:24